



New York Mercantile Exchange

October 26, 2004

2004 OCT 26 11:30 AM

BY FAX
Office of the Secretariat
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20581

Re: Certification: New York Mercantile Exchange, Inc.
Submission #04.139 (Listing of Additional Strike Prices for the
Gold, Copper, Crude Oil, Heating Oil, Natural Gas and Related Calendar
Spread Option Contracts)

Dear CFTC Commissioners:

Pursuant to COMEX Rule 15.03(c), COMEX Rule 17.04 and NYMEX Rule 300.20, the
President of the New York Mercantile Exchange, Inc. ("Exchange") has directed that additional
strike prices be added for certain contract months in the Gold, Copper, Crude Oil, Heating Oil,
Natural Gas and related Calendar Spread option contracts as detailed below:

- (A) On October 21, 2004, the Exchange added a call and a put:
(1) at the strike price of 18300 for the December 2004 contract month of the
Heating Oil option contract;
(2) at the strike price of 6800 for the January 2005 contract month of the Crude
Oil option contract;
(3) at the strike price of 20700 for the January 2005 contract month of the
Heating Oil option contract;
(4) at the strike prices of 17400, 17700, 17800 and 18200 for the February 2005
contract month of the Heating Oil option contract;
(5) at the strike price of 75 for the February 2005 contract month of the WTI
Crude Oil One month Calendar Spread option contract;
(6) at the strike prices of 10600 and 11400 for the February 2005 contract
month of the Natural Gas option contract;
(7) at the strike prices of 8650, 10300 and 10600 for the March 2005 contract
month of the Natural Gas option contract;

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The New York Mercantile Exchange, Inc., is composed of two divisions.
The NYMEX Division offers trading in crude oil, heating oil, unleaded gasoline,
natural gas, electricity, coal, propane, platinum, and palladium. The COMEX Division
offers trading in gold, silver, copper, and aluminum.

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(8) at the strike price of 17700 for the March 2005 contract month of the Heating Oil option contract;

(9) at the strike prices of 7100 and 9500 for the June 2005 contract month of the Natural Gas option contract;

(10) at the strike price 530 for the August 2005 contract month of the Gold option contract;

(11) at the strike prices of 7100, 8500 and 9500 for the September 2005 contract month of the Natural Gas option contract;

(12) at the strike price of 7600 for the March 2006 contract month of the Natural Gas option contract;

(B) On October 22, 2004, the Exchange added a call and a put:

(13) at the strike prices of 9050, 9100, 9750 and 11750 for the December 2004 contract month of the Natural Gas option contract;

(14) at the strike price of 18400 for the December 2004 contract month of the Heating Oil option contract;

(15) at the strike prices of 20200, 20600, 20800 and 21200 for the January 2005 contract month of the Heating Oil option contract;

(16) at the strike price of 122 for the January 2005 contract month of the Copper option contract;

(17) at the strike price of 18800 for the February 2005 contract month of the Heating Oil option contract;

(18) at the strike price of 25500 for the February 2005 contract month of the Natural Gas option contract;

(19) at the strike price of 9050 for the March 2005 contract month of the Natural Gas option contract;

(20) at the strike price of 20400 for the March 2005 contract month of the Heating Oil option contract;

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(21) at the strike price of 4050 for the December 2008 contract month of the Crude Oil option contract;

(C) On October 25, 2004, the Exchange added a call and a put:

(22) at the strike price of 800 for the December 2004 contract month of the WTI Crude Oil One month Calendar Spread option contract;

(23) at the strike prices of 18700 and 19100 for the December 2004 contract month of the Heating Oil option contract;

(24) at the strike prices of 8850, 8900, 8950, 9900 and 12750 for the December 2004 contract month of the Natural Gas option contract;

(25) at the strike prices of 18600, 20300 and 21700 for the January 2005 contract month of the Heating Oil option contract;

(26) at the strike prices of 11700, 11800, 16200 and 18000 for the January 2005 contract month of the Natural Gas option contract;

(27) at the strike price of 6600 for the February 2005 contract month of the Crude Oil option contract;

(28) at the strike prices of 10700, 11800 and 25000 for the February 2005 contract month of the Natural Gas option contract;

(29) at the strike price of 19400 for the February 2005 contract month of the Heating Oil option contract;

(30) at the strike prices of 10450, 10700, 10900 and 18000 for the March 2005 contract month of the Natural Gas option contract;

(31) at the strike price of 75 for the March 2005 contract month of the WTI Crude Oil One month Calendar Spread option contract;

(32) at the strike price of 8800 for the June 2005 contract month of the Natural Gas option contract;

(33) at the strike price of 8800 for the July 2005 contract month of the Natural Gas option contract;

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(34) at the strike price of 8800 for the August 2005 contract month of the Natural Gas option contract;

(35) at the strike prices of 7150 and 8800 for the September 2005 contract month of the Natural Gas option contract;

(36) at the strike price of 8800 for the October 2005 contract month of the Natural Gas option contract;

(37) at the strike price of 700 for the June 2006 contract month of the Gold option contract;

(38) at the strike price of 800 for the June 2007 contract month of the Gold option contract;

(39) at the strike price of 4150 for the December 2007 contract month of the Crude Oil option contract; and

(D) On October 26 2004, the Exchange added a call and a put:

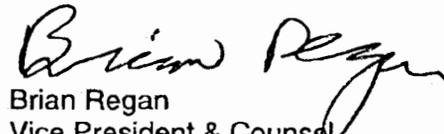
(40) at the strike price of 7400 for the February 2005 contract month of the Crude Oil option contract.

Pursuant to the terms of COMEX Rule 15.03(c), COMEX Rule 17.04 and NYMEX Rule 300.20, the strike prices noted above are in increments that are consistent with the pricing for the underlying futures contract. COMEX Rule 15.03(c), COMEX Rule 17.04 and NYMEX Rule 300.20 permit such directed strike prices to be effective upon adoption, provided that notice to the CFTC is given within three business days of the strike price listing.

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Should you have any questions concerning the above, please contact the undersigned at (212) 299-2207.

Very truly yours,


Brian Regan
Vice President & Counsel

cc: Christopher K. Bowen
George Henderson
Michael Campanelli