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December 2, 2004

BY EMAIL

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 #04.164 (Listing of Additional Strike Prices for the
Gold, Silver, Copper, Heating Oil, Unleaded Gasoline, Natural Gas and
Related Calendar Spread Option Contracts)

Dear CFTC Commissioners:

Pursuant to COMEX Rule 15.03(c), COMEX Rule 16.03, 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, Silver, Copper, Heating Oil, Unleaded Gasoline, Natural Gas and related Calendar Spread option contracts as detailed below:

- (A) On November 29, 2004, the Exchange added a call and a put:
- (1) at the strike price of 134 for the January 2005 contract month of the Copper option contract;
 - (2) at the strike price of 540 for the February 2005 contract month of the Gold option contract;
 - (3) at the strike price of 1400 for the March 2005 contract month of the Natural Gas One month Calendar Spread option contract;
 - (4) at the strike price of 8850 for the April 2005 contract month of the Natural Gas option contract;
 - (5) at the strike price of 175 for the May 2005 contract month of the Copper option contract;
 - (6) at the strike prices of 925 and 1500 for the May 2005 contract month of the Silver option contract;
 - (7) at the strike price of 146 for the July 2005 contract month of the Copper option contract;

(B) On November 30, 2004, the Exchange added a call and a put:

(8) at the strike price of 17300 for the January 2005 contract month of the Unleaded Gasoline option contract;

(9) at the strike price of 18700 for the March 2005 contract month of the Unleaded Gasoline option contract;

(10) at the strike price of 18700 for the March 2005 contract month of the Heating Oil option contract;

(11) at the strike prices of 950 and 1050 for the May 2005 contract month of the Silver option contract;

(C) On December 1, 2004, the Exchange added a call and a put:

(12) at the strike price of 490 for the January 2005 contract month of the Gold option contract;

(13) at the strike prices of 925 and 1000 for the February 2005 contract month of the Silver option contract;

(14) at the strike price of 17400 for the March 2005 contract month of the Heating Oil option contract;

(15) at the strike price of 975 for the December 2005 contract month of the Silver option contract;

(D) On December 2, 2004, the Exchange added a call and a put:

(16) at the strike prices of 134 and 152 for the February 2005 contract month of the Copper option contract;

(17) at the strike price of 495 for the April 2005 contract month of the Gold option contract;

(18) at the strike price of 7900 for the June 2005 contract month of the Natural Gas option contract;

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(19) at the strike price of 8400 for the September 2005 contract month of the Natural Gas option contract; and

(20) at the strike price of 825 for the December 2006 contract month of the Silver option contract.

Pursuant to the terms of COMEX Rule 15.03(c), COMEX Rule 16.03, 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 16.03, 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.

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