



New York
Mercantile Exchange

December 17, 2004

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 #04.178 (Listing of Additional Strike Prices for the
Gold, Silver, Copper, Natural Gas, Crude Oil 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, Natural Gas and related Calendar Spread option contracts as detailed below:

- (A) On December 13, 2004, the Exchange added a call and a put:
- (1) at the strike price of 350 for the January 2005 contract month of the Gold option contract;
 - (2) at the strike price of 124 for the March 2005 contract month of the Copper option contract;
- (B) On December 14, 2004, the Exchange added a call and a put:
- (3) at the strike price of 132 for the February 2005 contract month of the Copper option contract;
- (C) On December 15, 2004, the Exchange added a call and a put:
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- (4) at the strike price of 138 for the February 2005 contract month of the Copper option contract;
 - (5) at the strike price of 620 for the February 2005 contract month of the Silver 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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(6) at the strike price of 144 for the March 2005 contract month of the Copper option contract;

(7) at the strike price of 9650 for the March 2005 contract month of the Natural Gas option contract;

(8) at the strike price of 495 for the June 2005 contract month of the Gold option contract;

(9) at the strike price of -650 for the June 2005 contract month of the Natural Gas Six month Calendar Spread option contract;

(D) On December 16, 2004, the Exchange added a call and a put:

(10) at the strike prices of 590 and 600 for the February 2005 contract month of the Silver option contract; and

(11) at the strike price of 6400 for the May 2005 contract month of the Crude Oil 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.

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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