



New York Mercantile Exchange

NYMEX/COMU: X. Two divisions, one marketplace

November 2, 2004

VIA ELECTRONIC MAIL AND FACSIMILE TRANSMISSION

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

RE: Submission No. 04.154: Changes in Timing and Location of WTI-Brent Spread Trading

Dear Ms. Webb:

The New York Mercantile Exchange, Inc. ("NYMEX") hereby notifies the Commodity Futures Trading Commission ("CFTC") of a self-certification filing involving changes in the timing and location of WTI-Brent spread trading.

With the launch of the Dublin trading floor on November 1, 2004, the Exchange allows the trading of a WTI-Brent spread, which is quoted at a differential and is split into the respective legs of the spread when the spread is cleared. The trading hours and location for this WTI-Brent spread are to be amended as follows:

Effective Trading Hours for WTI-Brent Spread Trading

(Underlining indicates additions; strikethroughs indicate deletions.)

Table with 3 columns: Session type, Dublin time, and New York time. Rows include Dublin open outcry session, New York open outcry session, and After hours electronic trading via NYMEX ACCESS®.

In effect, the Exchange has determined to amend these hours to permit WTI-Brent Spread trading during the hours that the Dublin trading floor is open (i.e., from 10AM to 7:30 PM Prevailing Dublin time). Trading will only take place on the Dublin floor and on NYMEX ACCESS®.

Pursuant to Section 5c(c) of the Commodity Exchange Act ("Act") and CFTC Rule 40.6, the Exchange hereby certifies that the actions stated above comply with the Act, including regulations under the Act. Pursuant to Section 5c(c) of the Act and CFTC Rule 40.5, the Exchange additionally is submitting a voluntary request for Commission

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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, propane, platinum and palladium. The COMEX Division offers trading in gold, silver, copper, aluminum, and the FTSE Eurotop 100® index, and the FTSE Eurotop 300® index.

review and approval of this filing. Finally, the effective date for the actions stated in this letter shall be Wednesday, November 3, 2004.

The purpose of this change is to better serve our markets by permitting trading in the venue which has presented the best commercial opportunities for our markets since the launch of the contract.

Consequently, should you have any questions concerning the above, please contact the undersigned at (212) 299-2200.

Very truly yours,



Christopher Bowen  
General Counsel and  
Chief Administrative Officer

cc: Eileen Donovan  
Riva Adriance, Esq.  
Clarence Sanders, Esq.