

December 23, 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 #04.181 (Listing of Additional Strike Prices for the
Gold, Silver and Heating Oil 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 and Heating Oil option contracts as detailed below:

- (A) On December 17, 2004, the Exchange added a call and a put:
 - (1) at the strike price of 540 for the April 2005 contract month of the Gold option contract;

- (B) On December 20, 2004, the Exchange added a call and a put:
 - (2) at the strike price of 16800 for the April 2005 contract month of the Heating Oil option contract;

- (C) On December 22, 2004, the Exchange added a call and a put:
 - (3) at the strike price of 18300 for the April 2005 contract month of the Heating Oil option contract;
 - (4) at the strike price of 975 for the May 2005 contract month of the Silver option contract;
 - (5) at the strike price of 350 for the October 2005 contract month of the Gold option contract; and

(D) On December 23, 2004, the Exchange added a call and a put:

(6) at the strike price of 17100 for the March 2005 contract month of the Heating 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.

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
Donna Talamo