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October 12, 2004

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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 #04.131 (Listing of Additional Strike Prices for the  
Gold, Copper, Crude Oil, Heating Oil and Natural Gas 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 and Natural Gas option contracts as detailed below:

- (A) On October 8, 2004, the Exchange added a call and a put:
- (1) at the strike price of 138 for the November 2004 contract month of the Copper option contract;
  - (2) at the strike price of 17600 for the December 2004 contract month of the Heating Oil option contract;
  - (3) at the strike prices of 16800, 16900, 18400, 18700 and 18800 for the January 2005 contract month of the Heating Oil option contract;
  - (4) at the strike prices of 9300, 9700, 9800 and 10200 for the March 2005 contract month of the Natural Gas option contract;
  - (5) at the strike prices of 8100, 8200, 8600 and 8700 for the April 2005 contract month of the Natural Gas option contract;
  - (6) at the strikes prices of 6700 and 8500 for the June 2005 contract month of the Natural Gas option contract;
  - (7) at the strike price of 6700 for the September 2005 contract month of the Natural Gas option contract;

(8) at the strike price of 7150 for the March 2006 contract month of the Natural Gas option contract;

(B) On October 11, 2004, the Exchange added a call and a put:

(9) at the strike price of 490 for the November 2004 contract month of the Gold option contract;

(10) at the strike price 142 for the November 2004 contract month of the Copper option contract;

(11) at the strike price of 6700 for the December 2004 contract month of the Crude Oil option contract;

(12) at the strike prices of 16800 and 17100 for the December 2004 contract month of the Heating Oil option contract;

(13) at the strike price of 16500 for the January 2005 contract month of the Natural Gas option contract;

(14) at the strike prices of 16700, 18900 and 19100 for the January 2005 contract month of the Heating Oil option contract;

(15) at the strike price of 16900 for the February 2005 contract month of the Heating Oil option contract;

(16) at the strike price of 16600 for the March 2005 contract month of the Heating Oil option contract;

(17) at the strike prices of 7200 and 20000 for the March 2006 contract month of the Natural Gas option contract;

(C) On October 12, 2004, the Exchange added a call and a put:

(18) at the strike price of 152 for the November 2004 contract month of the Copper option contract;

(19) at the strike price of 17300 for the December 2004 contract month of the Heating Oil option contract;

(20) at the strike prices of 17100, 17900 and 19200 for the January 2005 contract month of the Heating Oil option contract;

(21) at the strike prices of 16000 and 17000 for the January 2005 contract month of the Natural Gas option contract;

(22) at the strike price of 6900 for the January 2005 contract month of the Crude Oil option contract;

(23) at the strike price of 16600 for the February 2005 contract month of the Heating Oil option contract;

(24) at the strike price of 8300 for the April 2005 contract month of the Natural Gas option contract; and

(25) at the strike price of 7300 for the December 2005 contract month of the Natural Gas 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.

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