



August 25, 2008
Mr. David Stawick
Acting Secretary of the Commission
Commodity Futures Trading Commission
Three Lafayette Center
1155 21st Street, N.W.
Washington, D.C. 20581

RE: Merger of NYMEX Holdings, Inc. and CME NY Inc.

Dear Mr. Stawick:

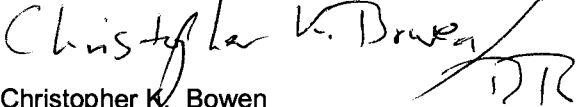
On August 22, 2008, NYMEX Holdings, Inc. was merged with and into CME NY Inc., a wholly-owned subsidiary of CME Group Inc. Upon completion of the merger transaction, CME NY Inc. changed its name to CME NYMEX Holdings Inc. The New York Mercantile Exchange Inc. ("NYMEX") and its subsidiary, Commodity Exchange Inc. ("COMEX") are separate subsidiaries of CME NYMEX Holdings Inc. Both entities are and will continue to be separate designated contract markets registered with the Commodity Futures Trading Commission ("CFTC"). They will continue to operate as two separate self-regulatory organizations. For an interim period, NYMEX will also continue to maintain its own designation as a derivatives clearing organization.

As a result of the merger, the market regulation functions for CME Group, NYMEX and COMEX will be performed by one joint Market Regulation Department. Regulatory services will be provided to NYMEX and COMEX pursuant to a Regulatory Services Agreement executed by Chicago Mercantile Exchange Inc. ("CME") and NYMEX. Also, the clearing of NYMEX and COMEX trades will be covered by a Clearing Services Agreement between CME and NYMEX. The Regulatory Services Agreement and the Clearing Services Agreement will be sent under separate cover to the CFTC.

Pursuant to Commission Rule 38.5(d), NYMEX hereby certifies that CME, NYMEX and COMEX currently meet all of the requirements set forth in Sections 5(b) and 5(d) of the Commodity Exchange Act, as amended, and in Part 38 of the Commission's Regulations, as applicable. In addition, NYMEX hereby certifies that NYMEX currently meets all of the requirements set forth in Section 5b of the Commodity Exchange Act, as amended, and in Part 39 of the Commission's Regulations, as applicable. Further, NYMEX certifies that after the implementation of the Regulatory Services Agreement and the Clearing Services Agreement discussed above, NYMEX and COMEX will continue to meet all of the requirements set forth in Sections 5(b) and 5(d) of the Commodity Exchange Act, as amended, and in Part 38 of the Commission's Regulations, as applicable.

In addition, NYMEX hereby certifies that NYMEX will continue to meet all of the requirements set forth in Section 5b of the Commodity Exchange Act, as amended, and in Part 39 of the Commission's Regulations, as applicable.

Sincerely,

Handwritten signature of Christopher K. Bowen in cursive, with the initials "DK" written below the signature.

Christopher K. Bowen
NYMEX General Counsel

cc: Ananda Radhakrishnan, Director, CFTC DCIO
Richard Shilts, Director, CFTC DMO