

February 18, 2004

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VIA FACSIMILE

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 #04.18 (Listing of Additional Strike Prices for the
Gold, Silver, Copper, Unleaded Gasoline, Heating Oil and Natural
Gas 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, Unleaded Gasoline, Heating Oil and Natural Gas option contracts as detailed below:

- (A) On February 12, 2004, the Exchange added a call and a put:
- (1) at the strike prices of 124 and 126 for the April 2004 contract month of the Copper option contract;
 - (2) at the strike prices of 12700, 12900 and 13100 for the May 2004 contract month of the Unleaded Gasoline option contract;
 - (3) at the strike price of 20000 for the July 2004 contract month of the Unleaded Gasoline option contract;
 - (4) at the strike price of 150 for the July 2004 contract month of the Copper option contract;
 - (5) at the strike price of 750 for the September 2004 contract month of the Silver option contract;
 - (6) at the strike price of 510 for the December 2004 contract month of the Gold option contract;

(B) On February 13, 2004, the Exchange added a call and a put:

(7) at the strike price of 12400 for the April 2004 contract month of the Heating Oil option contract;

(8) at the strike price of 12900 for the June 2004 contract month of the Unleaded Gasoline option contract;

(9) at the strike price of 7100 for the July 2004 contract month of the Natural Gas option contract;

(10) at the strike price of 7300 for the August 2004 contract month of the Natural Gas option contract;

(11) at the strike prices of 6200 and 7300 for the September 2004 contract month of the Natural Gas option contract;

(12) at the strike price of 7300 for the October 2004 contract month of the Natural Gas option contract;

(C) On February 17, 2004, the Exchange added a call and a put:

(13) at the strike price of 13200 for the May 2004 contract month of the Unleaded Gasoline option contract;

(14) at the strike prices of 128 and 138 for the May 2004 contract month of the Copper option contract;

(15) at the strike price of 13100 for the June 2004 contract month of the Unleaded Gasoline option contract;

(16) at the strike price of 146 for the July 2004 contract month of the Copper option contract;

(17) at the strike price of 6850 for the July 2004 contract month of the Natural Gas option contract;

(D) On February 18, 2004, the Exchange added a call and a put:

(18) at the strike price of 138 for the March 2004 contract month of the Copper option contract;

(19) at the strike price of 825 for the April 2004 contract month of the Silver option contract;

(20) at the strike price of 128 for the April 2004 contract month of the Copper option contract;

(21) at the strike price of 142 for the May 2004 contract month of the Copper option contract;

(22) at the strike price of 950 for the May 2004 contract month of the Silver option contract;

(23) at the strike prices of 136, 148, 154 and 160 for the July 2004 contract month of the Copper option contract;

(24) at the strike price of 6900 for the August 2004 contract month of the Natural Gas option contract;

(25) at the strike price of 6900 for the September 2004 contract month of the Natural Gas option contract; and

(26) at the strike price of 122 for the September 2004 contract month of the Copper 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