

Mail Stop 4561

June 3, 2008

Dr. James E. Newsome  
President and Chief Executive Officer  
NYMEX Holdings, Inc.  
One North End Avenue  
New York, NY 10282-1101

**Re: NYMEX Holdings, Inc.  
Form 10-K for the year ended December 31, 2007  
Form 10-Q for the quarter ended March 31, 2008  
File No. 1-33149**

Dear Dr. Newsome:

We have reviewed your filings and have the following comments. Where indicated, we think you should revise your document in future filings in response to these comments. If you disagree, we will consider your explanation as to why our comment is inapplicable or a revision is unnecessary. Please be as detailed as necessary in your explanation. In some of our comments, we may ask you to provide us with information so we may better understand your disclosure. After reviewing this information, we may raise additional comments.

Please understand that the purpose of our review process is to assist you in your compliance with the applicable disclosure requirements and to enhance the overall disclosure in your filing. We look forward to working with you in these respects. We welcome any questions you may have about our comments or any other aspect of our review. Feel free to call us at the telephone numbers listed at the end of this letter.

Form 10-K for the Year Ended December 31, 2007

Note 2. Summary of Significant Accounting Policies

1. We note that you revised your consolidated statements of cash flows for prior periods to classify the net change in marketable securities as cash flows from operating activities. Please tell us how you determined that these changes were not qualitatively or quantitatively material to prior annual or quarterly periods.

Note 14. Share-based Compensation

2. In future filings, please revise your restricted stock unit awards roll-forward to disclose the weighted-average grant-date fair value rather than the aggregate grant-date fair value.

Form 10-Q for the Quarter Ended March 31, 2008

Condensed Consolidated Statements of Cash Flows

3. Please tell us what consideration you gave to paragraph C5(c) of SFAS 159 with regard to the classification of the net change in marketable securities in your consolidated statements of cash flows.

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Please respond to these comments within 10 business days or tell us when you will provide us with a response. Please understand that we may have additional comments after reviewing your responses to our comments.

We urge all persons who are responsible for the accuracy and adequacy of the disclosure in the filing to be certain that the filing includes all information required under the Securities Exchange Act of 1934 and that they have provided all information investors require for an informed investment decision. Since the company and its management are in possession of all facts relating to a company's disclosure, they are responsible for the accuracy and adequacy of the disclosures they have made.

In connection with responding to our comments, please provide, in writing, a statement from the company acknowledging that:

- the company is responsible for the adequacy and accuracy of the disclosure in the filing;
- staff comments or changes to disclosure in response to staff comments do not foreclose the Commission from taking any action with respect to the filings; and
- the company may not assert staff comments as a defense in any proceeding initiated by the Commission or any person under the federal securities laws of the United States.

In addition, please be advised that the Division of Enforcement has access to all information you provide to the staff of the Division of Corporation Finance in our review of your filings or in response to our comments on your filing.

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You may contact Jonathan Wiggins at (202) 551-3694 or me at (202) 551-3486 if you have questions regarding comments on the financial statements and related matters.

Sincerely,

Daniel L. Gordon  
Branch Chief