

Mail Stop 4561

June 26, 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 completed our review of your Form 10-K and related filings and have no further comments at this time.

Sincerely,

Daniel L. Gordon
Branch Chief