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January 27, 2005

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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 #05.12 (Listing of Additional Strike Prices for the
Copper, Heating Oil, Unleaded Gasoline, Natural Gas, Crude Oil and
Crude Oil Average Price Option Contracts)

Dear CFTC Commissioners:

Pursuant to 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 Copper, Heating Oil, Unleaded Gasoline, Natural Gas, Crude Oil and related Crude Oil Average Price option contracts as detailed below:

- (A) On January 24, 2005, the Exchange added a call and a put:
- (1) at the strike price of 17300 for the March 2005 contract month of the Heating Oil option contract;
 - (2) at the strike price of 5375 the April 2005 contract month of the Crude Oil Average Price option contract;
 - (3) at the strike price of 5375 for the May 2005 contract month of the Crude Oil Average Price option contract;
 - (4) at the strike price of 5375 for the June 2005 contract month of the Crude Average Price Oil option contract;
 - (5) at the strike price of 10000 for the June 2006 contract month of the Natural Gas option contract;

(6) at the strike price of 10000 for the September 2006 contract month of the Natural Gas option contract;

(7) at the strike price of 10000 for the December 2006 contract month of the Natural Gas option contract;

(8) at the strike price of 10000 for the March 2007 contract month of the Natural Gas option contract;

(B) On January 25, 2005, the Exchange added a call and a put:

(9) at the strike price of 11500 for the March 2006 contract month of the Natural Gas option contract;

(C) On January 26, 2005, the Exchange added a call and a put:

(10) at the strike price of 148 for the March 2005 contract month of the Copper option contract;

(11) at the strike price of 17800 for the April 2005 contract month of the Unleaded Gasoline option contract;

(12) at the strike price of 4800 for the June 2005 contract month of the Natural Gas option contract; and

(D) On January 27, 2005, the Exchange added a call and a put:

(13) at the strike price of 6100 for the December 2005 contract month of the Crude Oil option contract.

Pursuant to the terms of 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 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.

CFTC Commissioners
January 27, 2005
Page 3

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
Donna Talamo