



New York
Mercantile Exchange

NYMEX/COMEX. Two divisions, one marketplace

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February 8, 2005

BY FAX

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 #05.18 (Listing of Additional Strike Prices for the
Gold, Silver, Copper, Heating Oil, Unleaded Gasoline Crack, Natural Gas
and WTI Crude Oil Calendar Spread 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, Heating Oil, Unleaded Gasoline Crack, Natural Gas and WTI Crude Oil Calendar Spread option contracts as detailed below:

(A) On February 3, 2005, the Exchange added a call and a put:

(1) at the strike price of 154 for the April 2005 contract month of the Copper option contract;

(2) at the strike price of 15700 the June 2005 contract month of the Heating Oil option contract;

(B) On February 4, 2005, the Exchange added a call and a put:

(3) at the strike price of -75 for the March 2005 contract month of the WTI Crude Oil One month Calendar Spread option contract;

(4) at the strike price of 9450 for the August 2005 contract month of the Natural Gas option contract;

(5) at the strike price of 15000 for the March 2006 contract month of the Natural Gas option contract;

New York Mercantile Exchange, Inc.
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New York, NY 10282-1101
(212) 299-2000

The New York Mercantile Exchange, Inc., is composed of two divisions. The NYMEX Division offers trading in crude oil, heating oil, unleaded gasoline, natural gas, electricity, propane, platinum and palladium. The COMEX Division offers trading in gold, silver, copper, aluminum, and the FTSE Eurotop 100[®] index, and the FTSE Eurotop 300[®] index.

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(C) On February 7, 2005, the Exchange added a call and a put:

(6) at the strike price of 610 for the April 2005 contract month of the Silver option contract;

(7) at the strike price of 9400 for the August 2005 contract month of the Natural Gas option contract;

(8) at the strike price of 7900 for the December 2005 contract month of the Natural Gas option contract;

(D) On February 8, 2005, the Exchange added a call and a put:

(9) at the strike price of 500 for the September 2005 contract month of the Unleaded Gasoline Crack option contract; and

(10) at the strike price of 700 for the October 2005 contract month of the Gold 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.

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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