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March 4, 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 #05.40 (Listing of Additional Strike Prices for the
Gold, Copper, Unleaded Gasoline, Natural Gas, Crude Oil, Heating Oil
Average Price and Related Calendar Spread Option Contracts)

Dear CFTC Commissioners:

Pursuant to COMEX Rule 15.03(c), 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, Copper, Unleaded Gasoline, Natural Gas, Crude Oil, Heating Oil Average Price and related Calendar Spread option contracts as detailed below:

- (A) On March 3, 2005, the Exchange added a call and a put:
1. at the strike price of 400 for the May 2005 contract month of the Gold option contract;
 2. at the strike price of 6600 the May 2005 contract month of the Crude Oil option contract;
 3. at the strike price of 6450 for the June 2005 contract month of the Crude Oil option contract;
 4. at the strike price of 16200 for the June 2005 contract month of the Heating Oil Average Price option contract;
 5. at the strike price of 19300 for the June 2005 contract month of the Unleaded Gasoline option contract;
 6. at the strike price of 8650 for the July 2005 contract month of the Natural Gas option contract;

7. at the strike price of 17300 for the July 2005 contract month of the Unleaded Gasoline option contract;

8. at the strike prices of 9250, 9450 and 9750 for the September 2005 contract month of the Natural Gas option contract;

9. at the strike price of 9950 for the November 2005 contract month of the Natural Gas option contract;

10. at the strike price of 450 for the December 2005 contract month of the WTI Twelve month Calendar Spread option contract;

11. at the strike price of 680 for the December 2005 contract month of the Gold option contract;

12. at the strike price of 8900 for the March 2006 contract month of the Natural Gas option contract;

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

13. at the strike price of 138 for the April 2005 contract month of the Copper option contract;

14. at the strike price of 6550 for the June 2005 contract month of the Crude Oil option contract;

15. at the strike prices of 18100, 19200 and 19700 for the June 2005 contract month of the Unleaded Gasoline option contract;

16. at the strike price of 17400 for the July 2005 contract month of the Unleaded Gasoline option contract;

17. at the strike price of 10050 for the November 2005 contract month of the Natural Gas option contract; and

18. at the strike price of 4400 for the December 2005 contract month of the Crude Oil option contract.

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Pursuant to the terms of COMEX Rule 15.03(c), 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 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
Donna Talamo