



New York  
Mercantile Exchange

NYMEX/COMEX. Two divisions, one marketplace

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March 11, 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 #05.45 (Listing of Additional Strike Prices for the  
Gold, Copper, Unleaded Gasoline, Natural Gas, Heating Oil, 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, Heating Oil, Crude Oil, Heating Oil Average Price and related Calendar Spread option contracts as detailed below:

- (A) On March 8, 2005, the Exchange added a call and a put:
1. at the strike price of 16700 for the May 2005 contract month of the Heating Oil option contract;
  2. at the strike price of 19100 for the May 2005 contract month of the Unleaded Gasoline option contract;
  3. at the strike prices of 6600, 6700 and 7100 for the June 2005 contract month of the Crude Oil option contract;
  4. at the strike price of 16600 for the June 2005 contract month of the Heating Oil Average Price option contract;
  5. at the strike price of 16700 for the June 2005 contract month of the Heating Oil option contract;

New York Mercantile Exchange, Inc.  
World Financial Center  
One North End Avenue  
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<sup>®</sup> index, and the FTSE Eurotop 300<sup>®</sup> index.*

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6. at the strike price of 18800 for the June 2005 contract month of the Unleaded Gasoline option contract;

7. at the strike prices of 17600, 17800 and 17900 for the July 2005 contract month of the Unleaded Gasoline option contract;

8. at the strike prices of 18200, 18300, 18600 and 18700 for the August 2005 contract month of the Unleaded Gasoline option contract;

9. at the strike price of 9700 for the September 2005 contract month of the Natural Gas option contract;

10. at the strike price of 9700 for the October 2005 contract month of the Natural Gas option contract;

11. at the strike price of 8750 for the March 2006 contract month of the Natural Gas option contract;

(B) On March 9, 2005, the Exchange added a call and a put:

12. at the strike price of 19900 for the May 2005 contract month of the Unleaded Gasoline option contract;

13. at the strike price of 6900 for the May 2005 contract month of the Crude Oil option contract;

14. at the strike price of 16900 for the May 2005 contract month of the Heating Oil Average Price option contract;

15. at the strike price of 16900 for the June 2005 contract month of the Heating Oil Average Price option contract;

16. at the strike price of 7200 for the June 2005 contract month of the Crude Oil option contract;

17. at the strike prices of 18200, 20600 and 20800 for the June 2005 contract month of the Unleaded Gasoline option contract;

18. at the strike price of 8700 for the June 2005 contract month of the Natural Gas option contract;

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19. at the strike price of 16900 for the July 2005 contract month of the Heating Oil Average Price option contract;

20. at the strike price of 16900 for the August 2005 contract month of the Heating Oil Average Price option contract;

21. at the strike price of 600 for the August 2005 contract month of the Gold option contract;

22. at the strike price of 9100 for the September 2005 contract month of the Natural Gas option contract;

23. at the strike prices of 250 and 500 for the December 2005 contract month of the Crude Oil Twelve month Calendar Spread option contract;

24. at the strike price of 8250 for the March 2006 contract month of the Natural Gas option contract;

25. at the strike price of 8400 for the April 2006 contract month of the Crude Oil option contract;

(C) On March 10, 2005, the Exchange added a call and a put:

26. at the strike price of 6600 for the April 2006 contract month of the Crude Oil option contract;

27. at the strike prices of 18100 and 18600 for the May 2005 contract month of the Unleaded Gasoline option contract;

28. at the strike prices of 18700, 19800 and 20700 for the June 2005 contract month of the Unleaded Gasoline option contract;

29. at the strike price of 7200 for the July 2005 contract month of the Crude Oil option contract;

30. at the strike price of 18200 for the July 2005 contract month of the Unleaded Gasoline option contract;

31. at the strike price of 6600 for the July 2005 contract month of the Crude Oil option contract;

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32. at the strike price of 6600 for the August 2005 contract month of the Crude Oil option contract;
33. at the strike price of 6600 for the September 2005 contract month of the Crude Oil option contract;
34. at the strike prices of 7950 and 9050 for the September 2005 contract month of the Natural Gas option contract;
35. at the strike price of 6600 for the October 2005 contract month of the Crude Oil option contract;
36. at the strike price of 600 for the October 2005 contract month of the Gold option contract;
37. at the strike price of 9450 for the October 2005 contract month of the Natural Gas option contract;
38. at the strike price of -380 for the November 2005 contract month of the Natural Gas One month Calendar Spread option contract;
39. at the strike price of 154 for the December 2005 contract month of the Copper option contract;
40. at the strike prices of 9800 and 12250 for the January 2006 contract month of the Natural Gas option contract; and
41. at the strike price of 12250 for the February 2006 contract month of the Natural Gas option contract.

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.

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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