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OFFICE OF THE SECRETARIAT

March 16, 2005

BY EMAIL

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 #05.47 (Listing of Additional Strike Prices for the
Copper, Unleaded Gasoline, Natural Gas, Heating Oil, Crude Oil,
Unleaded Gasoline 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, Unleaded Gasoline, Natural Gas, Heating Oil, Crude Oil, Unleaded Gasoline Average Price option contracts as detailed below:

- (A) On March 11, 2005, the Exchange added a call and a put:
1. at the strike price of 6800 for the May 2005 contract month of the Crude Oil option contract;
 2. at the strike price of 17300 for the September 2005 contract month of the Unleaded Gasoline option contract;
- (B) On March 14, 2005, the Exchange added a call and a put:
3. at the strike prices of 17200 and 17900 for the May 2005 contract month of the Heating Oil option contract;
 4. at the strike prices of 7400, 8100 and 9950 for the September 2005 contract month of the Natural Gas option contract;
 5. at the strike price of 9950 for the October 2005 contract month of the Natural Gas option contract;

6. at the strike price of 10450 for the November 2005 contract month of the Natural Gas option contract;

7. at the strike price of 7850 for the December 2005 contract month of the Natural Gas option contract;

(C) On March 15, 2005, the Exchange added a call and a put:

8. at the strike price of 18400 for the May 2005 contract month of the Unleaded Gasoline option contract;

9. at the strike price of 9250 for the June 2005 contract month of the Natural Gas option contract;

10. at the strike prices of 9100 and 12000 for the July 2005 contract month of the Natural Gas option contract;

11. at the strike price of 9100 for the August 2005 contract month of the Natural Gas option contract;

12. at the strike prices of 9200 and 9900 for the September 2005 contract month of the Natural Gas option contract;

13. at the strike price of 17200 for the September 2005 contract month of the Unleaded Gasoline Average Price option contract;

14. at the strike price of 10300 for the November 2005 contract month of the Natural Gas option contract;

(D) On March 16, 2005, the Exchange added a call and a put:

15. at the strike price of 144 for the April 2005 contract month of the Copper option contract;

16. at the strike price of 6700 for the May 2005 contract month of the Unleaded Gasoline option contract;

17. at the strike prices of 19900, 20100 and 20300 for the June 2005 contract month of the Unleaded Gasoline option contract;

18. at the strike price of 9150 for the August 2005 contract month of the Natural Gas option contract;

19. at the strike price of 17800 for the August 2005 contract month of the Unleaded Gasoline Price option contract;

20. at the strike prices of 8150 and 10050 for the September 2005 contract month of the Natural Gas option contract;

21. at the strike price of 17700 for the September 2005 contract month of the Unleaded Gasoline option contract;

22. at the strike price of 10350 for the November 2005 contract month of the Natural Gas option contract; and

23. at the strike price of 8050 for the December 2005 contract month of the Natural Gas 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
March 16, 2005
Page 4

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