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

- (A)      On March 17, 2005, the Exchange added a call and a put:
1.      at the strike prices of 7100, 7200 and 7300 for the May 2005 contract month of the Crude Oil option contract;
  2.      at the strike price of 17400 for the May 2005 contract month of the Heating Oil Average Price option contract;
  3.      at the strike price of 17400 for the June 2005 contract month of the Heating Oil Average Price option contract;
  4.      at the strike price of 6900 for the June 2005 contract month of the Crude Oil option contract;
  5.      at the strike price of 970 for the July 2005 contract month of the Platinum option contract;
  6.      at the strike price of 6800 for the July 2005 contract month of the Crude Oil option contract;

7. at the strike price of 7150 for the July 2005 contract month of the Crude Oil option contract;

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

9. at the strike prices of 7600 and 10250 for the September 2005 contract month of the Natural Gas option contract;

10. at the strike prices of 10400 and 10700 for the November 2005 contract month of the Natural Gas option contract;

11. at the strike prices of 10400 and 10500 for the December 2005 contract month of the Natural Gas option contract;

12. at the strike price of 6700 for the December 2005 contract month of the Crude Oil option contract;

13. at the strike price of 10400 for the January 2006 contract month of the Natural Gas option contract;

14. at the strike price of 10400 for the February 2006 contract month of the Natural Gas option contract;

15. at the strike prices of 10400 and 10500 for the March 2006 contract month of the Natural Gas option contract;

(B) On March 18, 2005, the Exchange added a call and a put:

16. at the strike prices of 18800 and 19400 for the May 2005 contract month of the Unleaded Gasoline option contract;

17. at the strike prices of 18200, 18300 and 18400 for the May 2005 contract month of the Unleaded Gasoline Average Price option contract;

18. at the strike price of 17600 for the May 2005 contract month of the Heating Oil Average Price option contract;

19. at the strike price of 17600 for the June 2005 contract month of the Heating Oil Average Price option contract;

20. at the strike prices of 18200 and 18400 for the June 2005 contract month of the Unleaded Gasoline Average Price option contract;

21. at the strike price of 7050 for the June 2005 contract month of the Crude Oil option contract;

22. at the strike prices of 18800 and 19300 for the June 2005 contract month of the Heating Oil option contract;

23. at the strike prices of 6900 and 7100 for the July 2005 contract month of the Crude Oil option contract;

24. at the strike price of 9300 for the July 2005 contract month of the Natural Gas option contract;

25. at the strike prices of 8200, 8300 and 9400 for the September 2005 contract month of the Natural Gas option contract;

26. at the strike price of 10650 for the November 2005 contract month of the Natural Gas option contract;

(C) On March 21, 2005, the Exchange added a call and a put:

27. at the strike prices of -65, -75 and -100 for the May 2005 contract month of the Crude Oil One month Calendar Spread option contract;

28. at the strike prices of 6850, 7300 and 7050 for the July 2005 contract month of the Crude Oil option contract;

29. at the strike price of 9150 for the July 2005 contract month of the Natural Gas option contract;

30. at the strike price of 24500 for the July 2005 contract month of the Unleaded Gasoline option contract;

31. at the strike price of 9300 for the August 2005 contract month of the Natural Gas option contract;

32. at the strike price of 18100 for the September 2005 contract month of the Unleaded Gasoline Average Price option contract;

33. at the strike price of 10550 for the November 2005 contract month of the Natural Gas option contract;

34. at the strike price of 8150 for the December 2005 contract month of the Natural Gas option contract;

35. at the strike price of 10200 for the January 2006 contract month of the Natural Gas option contract;

36. at the strike price of 12000 for the April 2006 contract month of the Natural Gas option contract;

(D) On March 22, 2005, the Exchange added a call and a put:

37. at the strike price of 144 for the May 2005 contract month of the Copper option contract;

38. at the strike price of 17800 for the June 2005 contract month of the Heating Oil Average Price option contract;

39. at the strike price of 22900 for the June 2005 contract month of the Unleaded Gasoline option contract;

40. at the strike prices of 18600 and 18900 for the July 2005 contract month of the Unleaded Gasoline option contract;

41. at the strike price of 19700 for the August 2005 contract month of the Unleaded Gasoline option contract;

42. at the strike price of 7650 for the September 2005 contract month of the Natural Gas option contract;

43. at the strike price of 530 for the February 2006 contract month of the Gold option contract;

44. at the strike price of 8400 for the March 2005 contract month of the Natural Gas option contract;

CFTC Commissioners  
March 22, 2005  
Page 5

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