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OFC. OF THE SECRETARIAT
April 18, 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 #05.70 (Listing of Additional Strike Prices for the
Gold, Copper, Unleaded Gasoline, Natural Gas, Heating Oil 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 and related Calendar Spread option contracts as detailed below:

- (A) On April 14, 2005, the Exchange added a call and a put:
1. at the strike prices of 128 and 142 for the June 2005 contract month of the Copper option contract;
 2. at the strike price of -150 for the June 2005 contract month of the Crude Oil One month Calendar Spread option contract;
 3. at the strike price of -150 for the July 2005 contract month of the Crude Oil One month Calendar Spread option contract;
 4. at the strike price of 22700 for the September 2005 contract month of the Unleaded Gasoline option contract;
 5. at the strike price of 168 for the October 2005 contract month of the Copper option contract;
 6. at the strike price of 9200 for the October 2005 contract month of the Natural Gas option contract;

(B) On April 15, 2005, the Exchange added a call and a put:

7. at the strike price of 148 for the May 2005 contract month of the Copper option contract;

8. at the strike prices of 19600 and 19700 for the January 2006 contract month of the Heating Oil option contract;

9. at the strike price of 19700 for the February 2006 contract month of the Heating Oil option contract;

10. at the strike price of 8150 for the March 2006 contract month of the Natural Gas option contract;

(C) On April 18, 2005, the Exchange added a call and a put:

11. at the strike price of 138 for the May 2005 contract month of the Copper option contract;

12. at the strike price of 128 for the August 2005 contract month of the Copper option contract; and

13. at the strike price of 385 for the December 2005 contract month of the Gold 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