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July 1, 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 #05.112 (Listing of Additional Strike Prices for the
Gold, Copper, Heating Oil, Crude Oil, Unleaded Gasoline, Natural Gas,
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, Heating Oil, Crude Oil, Unleaded Gasoline, Natural Gas, Heating Oil Average Price and related Calendar Spread option contracts as detailed below:

- (A) On June 28, 2005, the Exchange added a call and a put:
1. at the strike price of 172 for the August 2005 contract month of the Copper option contract;
 2. at the strike price of 20600 for the September 2005 contract month of the Unleaded Gasoline option contract;
 3. at the strike price of 7600 for the October 2005 contract month of the Crude Oil option contract;
 4. at the strike prices of 19400, 19700 and 19800 for the October 2005 contract month of the Unleaded Gasoline option contract;
 5. at the strike prices of 20600 and 21100 for the November 2005 contract month of the Heating Oil option contract;
 6. at the strike price of 550 for the February 2006 contract month of the Gold option contract;

7. at the strike price of 9100 for the October 2006 contract month of the Natural Gas option contract;

8. at the strike price of 15000 for the March 2007 contract month of the Natural Gas option contract;

(B) On June 29, 2005, the Exchange added a call and a put:

9. at the strike price of 19100 for the October 2005 contract month of the Unleaded Gasoline option contract;

10. at the strike price of 20300 for the October 2005 contract month of the Heating Oil option contract;

11. at the strike price of 7300 for the November 2005 contract month of the Crude Oil option contract;

12. at the strike price of 9350 for the December 2005 contract month of the Natural Gas option contract;

13. at the strike price of 510 for the February 2006 contract month of the Gold option contract;

14. at the strike prices of 9600 and 10750 for the March 2006 contract month of the Natural Gas option contract;

15. at the strike prices of 6600 and 9450 for the September 2006 contract month of the Natural Gas option contract;

(C) On June 30, 2005, the Exchange added a call and a put:

16. at the strike price of 174 for the August 2005 contract month of the Copper option contract;

17. at the strike prices of 154 and 200 for the September 2005 contract month of the Copper option contract;

18. at the strike price of -150 for the September 2005 contract month of the WTI Crude Oil One month Calendar Spread option contract;

19. at the strike price of -150 for the October 2005 contract month of the WTI Crude Oil One month Calendar Spread option contract;

20. at the strike price of 18700 for the October 2005 contract month of the Unleaded Gasoline option contract;

21. at the strike price of -150 for the November 2005 contract month of the WTI Crude Oil One month Calendar Spread option contract;

22. at the strike price of 19700 for the November 2005 contract month of the Heating Oil Average Price option contract;

23. at the strike price of -150 for the December 2005 contract month of the WTI Crude Oil One month Calendar Spread option contract;

24. at the strike price of 5850 for the December 2005 contract month of the Natural Gas option contract;

25. at the strike price of 19900 for the December 2005 contract month of the Heating Oil Average Price option contract;

26. at the strike price of 20100 for the January 2006 contract month of the Heating Oil option contract;

27. at the strike price of 19800 for the February 2006 contract month of the Heating Oil Average Price option contract;

28. at the strike price of 19300 for the March 2006 contract month of the Heating Oil Average Price option contract; and

29. at the strike price of 10400 for the June 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