

July 20, 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 #05.124 (Listing of Additional Strike Prices for the
Gold, Copper, Heating Oil, Crude Oil Average Price, Natural Gas, Crude
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, Heating Oil, Crude Oil Average Price, Natural Gas, Crude Oil and Calendar Spread option contracts as detailed below:

- (A) On July 15, 2005, the Exchange added a call and a put:
1. at the strike price of 320 for the August 2005 contract month of the Gold option contract;
 2. at the strike price of 10500 for the September 2005 contract month of the Natural Gas option contract;
 3. at the strike price of 22300 for the October 2005 contract month of the Heating Oil option contract;
 4. at the strike price of 11350 for the December 2005 contract month of the Natural Gas option contract;
 5. at the strike prices of 8100 and 8200 for the December 2005 contract month of the Crude Oil option contract;
 6. at the strike prices of 10700, 11800 and 13800 for the January 2006 contract month of the Natural Gas option contract;

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

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

8. at the strike price of 138 for the September 2005 contract month of the Copper option contract;

9. at the strike price of -110 for the September 2005 contract month of the Crude Oil One month Calendar Spread option contract;

10. at the strike price of 21400 for the October 2005 contract month of the Heating Oil option contract;

11. at the strike price of 8700 for the November 2005 contract month of the Crude Oil option contract;

12. at the strike prices of 7550 and 7600 for the December 2005 contract month of the Crude Oil option contract;

13. at the strike price of 21200 for the January 2006 contract month of the Heating Oil option contract;

14. at the strike price of 21200 for the March 2006 contract month of the Heating Oil option contract;

15. at the strike price of 115 for the March 2006 contract month of the Natural Gas One month Calendar Spread option contract;

16. at the strike price of 21200 for the April 2006 contract month of the Heating Oil option contract;

17. at the strike price of 7800 for the September 2006 contract month of the Natural Gas option contract;

(C) On July 19, 2005, the Exchange added a call and a put:

18. at the strike prices of 10350 and 11450 for the January 2006 contract month of the Natural Gas option contract;

19. at the strike price of 7550 for the February 2006 contract month of the Crude Oil option contract;

(D) On July 20, 2005, the Exchange added a call and a put:

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

21. at the strike prices of 154 and 168 for the August 2005 contract month of the Copper option contract;

22. at the strike prices of 20700 and 20900 for the October 2005 contract month of the Heating Oil option contract;

23. at the strike price of -100 for the February 2006 contract month of the WTI Crude Oil One month Calendar Spread option contract;

24. at the strike price of 7850 for the June 2006 contract month of the Natural Gas option contract; and

25. at the strike price of 7850 for the September 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