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July 27, 2005

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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 #05.129 (Listing of Additional Strike Prices for the
Silver, Copper, Crude Oil, Natural Gas and Unleaded Gasoline Option
Contracts)

Dear CFTC Commissioners:

Pursuant to COMEX Rule 16.03, 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 Silver, Copper, Crude Oil, Natural Gas and Unleaded Gasoline option contracts as detailed below:

- (A) On July 21, 2005, the Exchange added a call and a put:
1. at the strike prices of 9550, 9600 and 9950 for the December 2005 contract month of the Natural Gas option contract;
 2. at the strike price of 7550 for the June 2006 contract month of the Natural Gas option contract;
 3. at the strike price of 10000 for the December 2010 contract month of the Crude Oil option contract;
- (B) On July 22, 2005, the Exchange added a call and a put:
4. at the strike price of 7400 for the November 2005 contract month of the Crude Oil option contract;
 5. at the strike price of 950 for the March 2006 contract month of the Silver option contract;
 6. at the strike price of 11300 for the March 2006 contract month of the Natural Gas option contract;

7. at the strike price of 1100 for the May 2006 contract month of the Silver option contract;

8. at the strike price of 7650 for the September 2006 contract month of the Natural Gas option contract;

(C) On July 25, 2005, the Exchange added a call and a put:

9. at the strike price of 26500 for the September 2005 contract month of the Unleaded Gasoline option contract;

10. at the strike price of 8650 for the September 2005 contract month of the Natural Gas option contract;

11. at the strike price of 9900 for the November 2005 contract month of the Natural Gas option contract;

12. at the strike price of 7700 for the November 2005 contract month of the Crude Oil option contract;

13. at the strike price of 10600 for the December 2005 contract month of the Natural Gas option contract;

14. at the strike price of 11200 for the January 2006 contract month of the Natural Gas option contract.

(D) On July 27, 2005, the Exchange added a call and a put:

15. at the strike price of 176 for the September 2005 contract month of the Copper option contract;

16. at the strike price of 7450 for the September 2005 contract month of the Natural Gas option contract.

17. at the strike prices of 7800 and 8100 for the November 2005 contract month of the Crude Oil option contract;

18. at the strike price of 10150 for the November 2005 contract month of the Natural Gas option contract;

19. at the strike price of 10800 for the December 2005 contract month of the Natural Gas option contract;

20. at the strike price of 200 for the March 2006 contract month of the Copper option contract;

21. at the strike price of 7700 for the June 2006 contract month of the Natural Gas option contract; and

22. at the strike price of 7700 for the September 2006 contract month of the Natural Gas option contract.

Pursuant to the terms of COMEX Rule 16.03, 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 16.03, 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