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August 4, 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 #05.131 (Listing of Additional Strike Prices for the
Silver, Copper, Natural Gas, Crude Oil and Heating Oil 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, Natural Gas, Crude Oil and Heating Oil option contracts as detailed below:

- (A) On August 2, 2005, the Exchange added a call and a put:
1. at the strike price of 166 for the September 2005 contract month of the Copper option contract;
 2. at the strike prices of 9200 and 11600 for the December 2005 contract month of the Natural Gas option contract;
 3. at the strike prices of 11100, 12200 and 14500 for the January 2006 contract month of the Natural Gas option contract;
 4. at the strike prices of 12700, 14500 and 18000 for the February 2006 contract month of the Natural Gas option contract;
 5. at the strike prices of 9400, 9450 and 18000 for the March 2006 contract month of the Natural Gas option contract;
 6. at the strike price of 925 for the March 2006 contract month of the Silver option contract;

(B) On August 3, 2005, the Exchange added a call and a put:

7. at the strike price of 8550 for the September 2005 contract month of the Natural Gas option contract;

8. at the strike price of 156 for the October 2005 contract month of the Copper option contract;

9. at the strike price of 21300 for the October 2005 contract month of the Heating Oil option contract;

10. at the strike price of 11200 for the November 2005 contract month of the Natural Gas option contract;

11. at the strike price of 21200 for the December 2005 contract month of the Heating Oil option contract;

12. at the strike prices of 9400, 10300 and 11800 for the December 2005 contract month of the Natural Gas option contract;

13. at the strike price of 9600 for the December 2005 contract month of the Crude Oil option contract;

14. at the strike price of 12400 for the January 2006 contract month of the Natural Gas option contract;

15. at the strike prices of 11700 and 12800 for the February 2006 contract month of the Natural Gas option contract;

(C) On August 4, 2005, the Exchange added a call and a put:

16. at the strike price of 22300 for the November 2005 contract month of the Heating Oil option contract;

17. at the strike price of 7800 for the December 2005 contract month of the Crude Oil option contract;

18. at the strike prices of 11300 and 12400 for the February 2006 contract month of the Natural Gas option contract; and

19. at the strike price of 1500 for the July 2006 contract month of the Silver option contract.

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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