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September 14, 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 #05.164 (Listing of Additional Strike Prices for the
Gold, Heating Oil, Crude Oil, Natural Gas, Unleaded Gasoline 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, Heating Oil, Crude Oil, Natural Gas, Unleaded Gasoline and related Calendar Spread option contracts as detailed below:

- (A) On September 8, 2005, the Exchange added a call and a put:
1. at the strike price of 8600 for the October 2005 contract month of the Crude Oil option contract;
 2. at the strike price of 31500 for the November 2005 contract month of the Heating Oil option contract;
 3. at the strike prices of 27600, 34000 and 36000 for the November 2005 contract month of the Unleaded Gasoline option contract;
 4. at the strike price of 22400 for the December 2005 contract month of the Unleaded Gasoline option contract;
 5. at the strike prices of 27200, 27700, 29200, 42000 and 30500 for the December 2005 contract month of the Heating Oil option contract;
 6. at the strike price of 16750 for the December 2005 contract month of the Natural Gas option contract;

7. at the strike prices of 14800 and 15900 for the February 2006 contract month of the Natural Gas option contract;

8. at the strike price of 11250 for the March 2006 contract month of the Natural Gas option contract;

9. at the strike price of 11500 for the June 2006 contract month of the Natural Gas option contract;

10. at the strike price of 18000 for the September 2006 contract month of the Natural Gasoline option contract;

(B) On September 9, 2005, the Exchange added a call and a put:

11. at the strike prices of 13250 and 16000 for the December 2005 contract month of the Natural Gas option contract;

12. at the strike prices of 43000 and 50000 for the December 2005 contract month of the Heating Oil option contract;

13. at the strike price of 560 for the February 2006 contract month of the Gold option contract;

14. at the strike prices of 13200 and 15200 for the March 2006 contract month of the Natural Gas option contract;

(C) On September 12, 2005, the Exchange added a call and a put:

15. at the strike price of 15200 for the November 2005 contract month of the Natural Gas option contract;

16. at the strike prices of 13200, 16500 and 26500 for the December 2005 contract month of the Natural Gas option contract;

17. at the strike price of 29500 for the December 2005 contract month of the Heating Oil option contract;

18. at the strike price of 8300 for the January 2006 contract month of the Crude Oil option contract;

19. at the strike prices of 15100, 18500 and 19000 for the January 2006 contract month of the Natural Gas option contract;

20. at the strike prices of 13800 and 18500 for the February 2006 contract month of the Natural Gas option contract;

20. at the strike prices of 13150, 13600 and 17800 for the March 2006 contract month of the Natural Gas option contract;

21. at the strike price of 14500 for the April 2006 contract month of the Natural Gas option contract;

22. at the strike price of 5800 for the June 2006 contract month of the Natural Gas option contract;

23. at the strike price of 5800 for the September 2006 contract month of the Natural Gas option contract;

24. at the strike price of 17000 for the October 2006 contract month of the Natural Gas option contract;

25. at the strike prices of 5800 and 7950 for the December 2006 contract month of the Natural Gas option contract;

(D) On September 13, 2005, the Exchange added a call and a put:

26. at the strike prices of 12900 and 22000 for the March 2006 contract month of the Natural Gas option contract;

27. at the strike price of -75 for the November 2006 contract month of the WTI Crude Oil One month Calendar Spread option contract;

28. at the strike price of 25000 for the December 2006 contract month of the Natural Gas option contract; and

29. at the strike price of 28000 for the December 2006 contract month of the Unleaded Gasoline 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