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OFC. OF THE SECRETARIAT
September 16, 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 #05.165 (Listing of Additional Strike Prices for the
Gold, Silver, Copper, Heating Oil, Crude Oil, Natural Gas, Euro Natural
Gas, Unleaded Gasoline and Related Calendar Spread Option Contracts)

Dear CFTC Commissioners:

Pursuant to COMEX Rule 15.03(c), 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 Gold, Silver, Copper, Heating Oil, Crude Oil, Natural Gas, Euro Natural Gas, Unleaded Gasoline and related Calendar Spread option contracts as detailed below:

- (A) On September 14, 2005, the Exchange added a call and a put:
1. at the strike price of 34000 for the December 2005 contract month of the Unleaded Gasoline option contract;
 2. at the strike price of 31500 for the December 2005 contract month of the Heating Oil option contract;
 3. at the strike price of 15500 for the December 2005 contract month of the Natural Gas option contract;
 4. at the strike prices of 14300 and 15400 for the January 2006 contract month of the Natural Gas option contract;
 5. at the strike price of 14900 for the February 2006 contract month of the Natural Gas option contract;
 6. at the strike price of 12850 for the March 2006 contract month of the Natural Gas option contract;
 7. at the strike price of 14000 for the April 2006 contract month of the Euro Natural Gas option contract;

8. at the strike prices of 14000 and 20000 for the May 2006 contract month of the Euro Natural Gas option contract;

9. at the strike prices of 14000 and 20000 for the June 2006 contract month of the Euro Natural Gas option contract;

10. at the strike price of 23200 for the June 2006 contract month of the Heating Oil option contract;

11. at the strike prices of 14000 and 20000 for the July 2006 contract month of the Euro Natural Gas option contract;

12. at the strike prices of 14000 and 20000 for the August 2006 contract month of the Euro Natural Gas option contract;

13. at the strike prices of 14000 and 20000 for the September 2006 contract month of the Euro Natural Gas option contract;

14. at the strike price of 20000 for the October 2006 contract month of the Euro Natural Gas option contract;

(B) On September 15, 2005, the Exchange added a call and a put:

15. at the strike price of 162 for the October 2005 contract month of the Copper option contract;

16. at the strike price of -65 for the October 2005 contract month of the Crude Oil One month Calendar Spread option contract;

17. at the strike price of 500 for the November 2005 contract month of the Gold option contract;

18. at the strike price of 23400 for the December 2005 contract month of the Unleaded Gasoline option contract;

19. at the strike price of 13900 for the December 2005 contract month of the Natural Gas option contract;

20. at the strike price of 13150 for the December 2006 contract month of the Natural Gas option contract;

21. at the strike prices of 14700 and 15800 for the January 2006 contract month of the Natural Gas option contract;

22. at the strike price of 8600 for the January 2006 contract month of the Crude Oil option contract;

23. at the strike prices of 15400, 16500 and 16600 for the February 2006 contract month of the Natural Gas option contract;

24. at the strike prices of 12900, 14400 and 15500 for the March 2006 contract month of the Natural Gas option contract;

25. at the strike price of 22400 for the June 2006 contract month of the Heating Oil option contract;

26. at the strike price of 22400 for the July 2006 contract month of the Unleaded Gasoline option contract;

27. at the strike price of 600 for the August 2006 contract month of the Gold option contract;

(C) On September 16, 2005, the Exchange added a call and a put:

28. at the strike price of 850 for the November 2005 contract month of the Silver option contract;

29. at the strike price of 550 for the April 2006 contract month of the Gold option contract; and

30. at the strike price of 530 for the December 2006 contract month of the Gold option contract.

Pursuant to the terms of COMEX Rule 15.03(c), 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 15.03(c), 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.

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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