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October 6, 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 #05.179 (Listing of Additional Strike Prices for the
Gold, Copper, Heating Oil, 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, Natural Gas, Crude Oil and related Calendar Spread option contracts as detailed below:

- (A) On October 3, 2005, the Exchange added a call and a put:
1. at the strike prices of 15200, 17600, 18500, 20500 and 26000 for the December 2005 contract month of the Natural Gas option contract;
 2. at the strike prices of 17100, 18200, 18300 and 24000 for the January 2006 contract month of the Natural Gas option contract;
 3. at the strike prices of 24600, 27200 and 60000 for the January 2006 contract month of the Heating Oil option contract;
 4. at the strike prices of 18600, 19000 and 20300 for the February 2006 contract month of the Natural Gas option contract;
 5. at the strike price of 8900 for the February 2006 contract month of the Crude Oil option contract.
 6. at the strike prices of 16750, 17850 and 20500 for the March 2006 contract month of the Natural Gas option contract;
 7. at the strike price of 3000 for the March 2006 contract month of the Natural Gas One month Calendar Spread option contract;
 8. at the strike price of 16000 for the April 2006 contract month of the Natural Gas option contract;

9. at the strike price of 23700 for the June 2006 contract month of the Heating Oil option contract;

10. at the strike price of 12900 for the July 2006 contract month of the Natural Gas option contract;

11. at the strike price of 14700 for the October 2006 contract month of the Natural Gas option contract;

12. at the strike price of 23700 for the October 2006 contract month of the Heating Oil option contract;

(B) On October 4, 2005, the Exchange added a call and a put:

13. at the strike price of 176 for the November 2005 contract month of the Copper option contract;

14. at the strike price of 515 for the December 2005 contract month of the Gold option contract;

15. at the strike prices of 15550 and 16400 for the December 2005 contract month of the Natural Gas option contract;

16. at the strike prices of 17300, 17800 and 30000 for the January 2006 contract month of the Natural Gas option contract;

17. at the strike prices of 48000, 51500 and 53000 for the January 2006 contract month of the Heating Oil option contract;

18. at the strike price of 630 for the February 2006 contract month of the Gold option contract;

19. at the strike prices of 15150, 17700 and 26000 for the March 2006 contract month of the Natural Gas option contract;

20. at the strike price of 18000 for the April 2006 contract month of the Natural Gas option contract;

21. at the strike price of 18000 for the May 2006 contract month of the Natural Gas option contract;

22. at the strike price of 18000 for the June 2006 contract month of the Natural Gas option contract;

23. at the strike price of 18000 for the July 2006 contract month of the Natural Gas option contract;

24. at the strike price of 18000 for the August 2006 contract month of the Natural Gas option contract;

25. at the strike price of 18000 for the October 2006 contract month of the Natural Gas option contract;

26. at the strike price of 18000 for the November 2006 contract month of the Natural Gas option contract;

27. at the strike price of 18000 for the December 2006 contract month of the Natural Gas option contract;

(C) On October 5, 2005, the Exchange added a call and a put:

28. at the strike price of 168 for the November 2005 contract month of the Copper option contract;

29. at the strike prices of 14850, 15900, 18100 and 19000 for the December 2005 contract month of the Natural Gas option contract;

30. at the strike prices of 18900 and 24500 for the January 2006 contract month of the Natural Gas option contract;

31. at the strike price of 8300 for the February 2006 contract month of the Crude Oil option contract.

32. at the strike prices of 18300, 18650, 18950 and 19400 for the February 2006 contract month of the Natural Gas option contract;

33. at the strike prices of 15450 and 18100 for the March 2006 contract month of the Natural Gas option contract;

34. at the strike price of 23400 for the April 2006 contract month of the Heating Oil option contract;

35. at the strike price of 14200 for the April 2006 contract month of the Natural Gas option contract;

36. at the strike price of 23400 for the May 2006 contract month of the Heating Oil option contract;

37. at the strike prices of 9950 and 11600 for the June 2006 contract month of the Natural Gas option contract;

38. at the strike price of 23400 for the July 2006 contract month of the Heating Oil option contract;

39. at the strike price of 23400 for the November 2006 contract month of the Heating Oil option contract;

40. at the strike price of 11500 for the December 2006 contract month of the Natural Gas option contract;

41. at the strike price of 11500 for the March 2007 contract month of the Natural Gas option contract;

42. at the strike price of 530 for the June 2007 contract month of the Gold option contract;

(D) On October 6, 2005, the Exchange added a call and a put:

43. at the strike prices of 178 and 250 for the December 2005 contract month of the Copper option contract;

44. at the strike price of 505 for the December 2005 contract month of the Gold option contract;

45. at the strike prices of 16600 and 17700 for the December 2005 contract month of the Natural Gas option contract;

46. at the strike price of 45000 for the January 2006 contract month of the Unleaded Gasoline option contract;

47. at the strike prices of 39000 and 40200 for the January 2006 contract month of the Heating Oil option contract;

48. at the strike prices of 17400 and 22500 for the January 2006 contract month of the Natural Gas option contract;

49. at the strike prices of 17800 and 18900 for the February 2006 contract month of the Natural Gas option contract;

50. at the strike price of 18500 for the March 2006 contract month of the Heating Oil option contract;

51. at the strike price of 14100 for the April 2006 contract month of the Natural Gas option contract; and

52. at the strike price of 162 for the June 2006 contract month of the Copper option contract.

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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.

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