

SUBMISSION COVER SHEET

IMPORTANT: Check box if Confidential Treatment is requested

Registered Entity Identifier Code (optional): 23-328 (2 of 4)

Organization: Commodity Exchange, Inc. ("COMEX")

Filing as a: DCM SEF DCO SDR

Please note - only ONE choice allowed.

Filing Date (mm/dd/yy): 09/14/23 **Filing Description:** Initial Listing of Micro Gold Option and Micro Gold Weekly Monday, Wednesday, and Friday Option Contracts

SPECIFY FILING TYPE

Please note only ONE choice allowed per Submission.

Organization Rules and Rule Amendments

- | | | |
|--------------------------|-------------------------------------|------------|
| <input type="checkbox"/> | Certification | § 40.6(a) |
| <input type="checkbox"/> | Approval | § 40.5(a) |
| <input type="checkbox"/> | Notification | § 40.6(d) |
| <input type="checkbox"/> | Advance Notice of SIDCO Rule Change | § 40.10(a) |
| <input type="checkbox"/> | SIDCO Emergency Rule Change | § 40.10(h) |

Rule Numbers:

New Product

Please note only ONE product per Submission.

- | | | |
|-------------------------------------|---------------------------------------|------------|
| <input checked="" type="checkbox"/> | Certification | § 40.2(a) |
| <input type="checkbox"/> | Certification Security Futures | § 41.23(a) |
| <input type="checkbox"/> | Certification Swap Class | § 40.2(d) |
| <input type="checkbox"/> | Approval | § 40.3(a) |
| <input type="checkbox"/> | Approval Security Futures | § 41.23(b) |
| <input type="checkbox"/> | Novel Derivative Product Notification | § 40.12(a) |
| <input type="checkbox"/> | Swap Submission | § 39.5 |

Product Terms and Conditions (product related Rules and Rule Amendments)

- | | | |
|--------------------------|---|----------------------|
| <input type="checkbox"/> | Certification | § 40.6(a) |
| <input type="checkbox"/> | Certification Made Available to Trade Determination | § 40.6(a) |
| <input type="checkbox"/> | Certification Security Futures | § 41.24(a) |
| <input type="checkbox"/> | Delisting (No Open Interest) | § 40.6(a) |
| <input type="checkbox"/> | Approval | § 40.5(a) |
| <input type="checkbox"/> | Approval Made Available to Trade Determination | § 40.5(a) |
| <input type="checkbox"/> | Approval Security Futures | § 41.24(c) |
| <input type="checkbox"/> | Approval Amendments to enumerated agricultural products | § 40.4(a), § 40.5(a) |
| <input type="checkbox"/> | “Non-Material Agricultural Rule Change” | § 40.4(b)(5) |
| <input type="checkbox"/> | Notification | § 40.6(d) |

Official Name(s) of Product(s) Affected:

Rule Numbers:

September 14, 2023

VIA ELECTRONIC PORTAL

Mr. Christopher J. Kirkpatrick
Office of the Secretariat
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, DC 20581

**Re: CFTC Regulation 40.2(a) Certification. Notification Regarding the Initial Listing of Micro Gold Option and Micro Gold Weekly Monday, Wednesday, and Friday Option Contracts.
COMEX Submission No. 23-328 (2 of 4)**

Dear Mr. Kirkpatrick:

Commodity Exchange, Inc. (“COMEX” or “Exchange”) is certifying to the Commodity Futures Trading Commission (“CFTC” or “Commission”) the initial listing of Micro Gold Monthly and Monday, Wednesday, and Friday Weekly Option contracts (the “Contracts”) for trading on the CME Globex electronic trading platform (“CME Globex”) and for submission for clearing via CME ClearPort, effective Sunday, October 1, 2023, for trade date Monday, October 2, 2023, as more specifically described below.

Contract Title	Micro Gold Option	Micro Gold Weekly Monday Option	Micro Gold Weekly Wednesday Option	Micro Gold Weekly Friday Option
	(Monthly)	(Weekly)		
Commodity Code	OMG	1MG;2MG;3MG;4MG; 5MG	1WG;2WG;3WG;4WG; 5WG	1FG;2FG;3FG;4FG; 5FG
Rulebook Chapter	124	125		
Underlying Futures Contract/ Commodity Code	Micro Gold Futures / MGC			
Contract Size	10 troy ounces			
Price Quotation	U.S. dollars and cents per troy ounce			
Minimum Trading Price Fluctuation	\$0.10 per troy ounce			
Value per Tick	\$1.00			
Option Exercise Style	American			
Settlement Type	Physical exercise into futures			
Listing Schedule	Monthly contracts listed for 20 consecutive months	Weekly contracts listed for 4 weeks		

Initial Listing	November 2023	Week 2 Monday	Week 1 Wednesday	Week 1 Friday
Expiration	Trading terminates on the fourth last business day of the month preceding the delivery month. If the fourth last business day occurs on a Friday or the day before a holiday, trading terminates on the prior business day	Trading terminates on Monday of the contract week	Trading terminates on Wednesday of the contract week	Trading terminates on the Friday of the contract week
Strike Price Increments	Minimum 40 strikes at \$5.00 per troy ounce increment above and below the at-the-money strike then 10 strikes at \$10.00 per troy ounce increment above and below the highest and lowest \$5.00 increment strike then 8 strikes at \$25.00 per troy ounce increment above and below the highest and lowest \$10.00 increment strike.	Minimum 40 strikes at \$5.00 per troy ounce increment above and below the at-the-money strike.		

Block Trade Minimum Threshold and Reporting Window	25 contracts - subject to a 15-minute reporting window
CME Globex Match Algorithm	K - Configurable
Trading and Clearing Hours	CME Globex Pre-open: Sunday 4:00 p.m. - 5:00 p.m. Central Time/CT Monday – Thursday 4:45 p.m. - 5:00 p.m. CT CME Globex Open: Sunday 5:00 p.m. - Friday 4:00 p.m. CT with a daily maintenance period from 4:00 p.m. - 5:00 p.m. CT CME ClearPort: Sunday 5:00 p.m. - Friday 4:00 p.m. CT with no reporting Monday - Thursday from 4:00 p.m. - 5:00 p.m. CT

The Contracts are referenced contracts that exercise into the Micro Gold Futures contract. These options contracts expire prior to the spot month limit taking affect but will be subject to federal position limits during the spot month upon exercise. The core referenced futures contract is the Gold Futures contract (Commodity Code: GC; Rulebook Chapter 113).

The Exchange reviewed the designated contracts market core principles (“Core Principles”) as set forth in the Commodity Exchange Act (“CEA” or “Act”) and identified that the Contracts may have some bearing on the following Core Principles:

- **Compliance with Rules:** Trading in the Contracts will be subject to the rules in Rulebook Chapter 4 which includes prohibitions against fraudulent, noncompetitive, unfair and abusive practices. Additionally, trading in the Contracts will also be subject to the full panoply of trade practice rules, the majority of which are contained in Chapter 5 and Chapter 8 of the Rulebook. As with all products listed for trading on one of CME Group’s designated contract markets, activity in the new products will be subject to extensive monitoring and surveillance by CME Group’s Market Regulation Department. The Market Regulation Department has the authority to exercise its investigatory and enforcement power where potential rule violations are identified.
- **Contract Not Readily Subject to Manipulation:** The Contracts are not readily susceptible to manipulation and are based on the deep liquidity of the underlying futures contracts.
- **Prevention of Market Disruption:** Trading in the Contracts will be subject to the Rules of COMEX which include prohibitions on manipulation, price distortion and disruptions of the delivery or cash-settlement process. As with all products listed for trading on one of CME Group’s designated contract markets, activity in the new products will be subject to extensive monitoring and surveillance by CME Group’s Market Regulation Department.
- **Position Limitations or Accountability:** The speculative position limits for the Contracts as demonstrated in this submission are consistent with the Commission’s guidance.
- **Availability of General Information:** The Exchange will publish on its website information regarding contract specifications, terms and conditions, as well as daily trading volume, open interest and price information for the Contracts.
- **Daily Publication of Trading Information:** The Exchange will publish information contract trading volumes, open interest levels, and price information daily on its website and through quote vendors for the Contracts.
- **Execution of Transactions:** The Contracts will be listed for trading on the CME Globex electronic trading and for clearing through CME ClearPort. The CME Globex trading venue provides for

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competitive and open execution of transactions. CME Globex affords the benefits of reliability and global connectivity.

- **Trade Information:** All required trade information for the Contracts will be included in the audit trail and is sufficient for the Market Regulation Department to monitor for market abuse.
- **Financial Integrity of Contract:** The Contracts will be cleared by the CME Clearing House which is a registered derivatives clearing organization with the Commission and is subject to all Commission regulations related thereto.
- **Protection of Market Participants:** COMEX Rulebook Chapters 4 and 5 contain multiple prohibitions precluding intermediaries from disadvantaging their customers. These rules apply to trading on all of the Exchange's competitive trading venues and will be applicable to transactions in these Contracts.
- **Disciplinary Procedures:** Chapter 4 of the Rulebook contains provisions that allow the Exchange to discipline, suspend or expel members or market participants that violate the rules. Trading in these Contracts will be subject to Chapter 4, and the Market Regulation Department has the authority to exercise its enforcement power in the event rule violations in these Contracts are identified.
- **Dispute Resolution:** Disputes with respect to trading in the Contracts will be subject to the arbitration provisions set forth in Chapter 6 of the Rulebook. The rules in Chapter 6 allow all nonmembers to submit a claim for financial losses resulting from transactions on the Exchange to arbitration. A member named as a respondent in a claim submitted by a nonmember is required to participate in the arbitration pursuant to the rules in Chapter 6. Additionally, the Exchange requires that members resolve all disputes concerning transactions on the Exchange via arbitration.

Pursuant to Section 5c(c) of the Act and CFTC Regulation 40.2(a), the Exchange hereby certifies that listing the Contracts complies with the Act, including regulations under the Act. There were no substantive opposing views to the proposal.

The Exchange certifies that this submission has been concurrently posted on the CME Group website at <http://www.cmegroup.com/market-regulation/rule-filings.html>.

Should you have any questions concerning the above, please contact the undersigned at (212) 299-2200 or via e-mail at CMEGSubmissionInquiry@cmegroup.com.

Sincerely,

/s/ Christopher Bowen
Managing Director and Chief Regulatory Counsel

Attachments: Exhibit A: COMEX Rulebook Chapters 124 and 125
Exhibit B: Position Limits, Position Accountability and Reportable Level Table in Chapter 5 of the COMEX Rulebook (attached under separate cover)
Exhibit C: Exchange Fees
Exhibit D: COMEX Rule 588.H. – (“Globex Non-Reviewable Trading Ranges”) Table (blackline format)
Exhibit E: COMEX Rule 589. – Special Price Fluctuation Limits and Daily Price Limits Table
Exhibit F: COMEX Rule 300.20. – Strike Price Listing and Exercise Procedures Table
Exhibit G: Cash Market Overview and Analysis of Deliverable Supply

Exhibit A

COMEX Rulebook

Chapter 124 Micro Gold Option

124100. SCOPE OF CHAPTER

This chapter is limited in application to put and call options on the Micro Gold Futures contract. In addition to the rules of this chapter, transactions in options on Micro Gold Futures shall be subject to the general rules of the Exchange insofar as applicable.

1248101. OPTION CHARACTERISTICS

The number of months open for trading at a given time shall be determined by the Exchange.

For each Micro Gold Option month traded on the Exchange, the underlying Micro Gold Futures contract month shall be the February, April, June, August, October, or December Micro Gold Futures contract, determined as follows:

<u>Option Contract Months Listed</u>	<u>Exercise into Underlying Futures</u>
January, February	February
March, April	April
May, June	June
July, August	August
September, October	October
November, December	December

124101.A. Trading Schedule

The hours of trading for this contract shall be determined by the Exchange.

124101.B. Trading Unit

A Micro Gold put or call option contract traded on the Exchange represents an option to assume a short or long position in the underlying futures contract traded on the Exchange.

124101.C. Price Increments

Prices shall be quoted in dollars and cents per ounce and prices shall be in multiples of \$0.10 per troy ounce.

124101.D. Position Limits, Exemptions, Position Accountability and Reportable Levels

The applicable position limits and/or accountability levels, in addition to the reportable levels, are set forth in the Position Limit, Position Accountability and Reportable Level Table in the Interpretations & Special Notices Section of Chapter 5.

A Person seeking an exemption from position limits for bona fide commercial purposes shall apply to the Market Regulation Department on forms provided by the Exchange, and the Market Regulation Department may grant qualified exemptions in its sole discretion.

Refer to Rule 559 for requirements concerning the aggregation of positions and allowable exemptions from the specified position limits.

124101.E. Termination of Trading

A Micro Gold option shall expire at the close of trading four business days prior to the end of the month preceding the option contract month; provided, however, that (1) if such day is a Friday, the expiration date shall be the preceding business day or (2) if such day is the day immediately prior to an Exchange holiday, the expiration date shall be the preceding business day. In the event that the official Exchange holiday schedule changes subsequent to the listing of a Micro Gold option, the originally listed expiration date shall remain in effect. In the event that the originally listed expiration day is declared a holiday, expiration will move to the business day immediately prior.

124101.F. Type Option

The option is an American-style option which can be exercised on any Business Day prior to and until expiration day.

124102. EXERCISE PRICES AND CHARACTERISTICS

Transactions shall be conducted for option contracts as set forth in Rule 300.20.

124103. SPECIAL PRICE FLUCTUATION LIMITS

At the commencement of each trading day, the contract shall be subject to special fluctuation limits as set forth in Rule 589 and in the Special Price Fluctuation Limits and Daily Price Limits Table in the Interpretations & Special Notices Section of Chapter 5.

**Chapter 125
Micro Gold Weekly Option**

125100. SCOPE OF CHAPTER

This chapter is limited in application to weekly put and call options on the Micro Gold Futures contract. In addition to the rules of this chapter, transactions in the Micro Gold Weekly Monday Option, Micro Gold Weekly Wednesday Option and Micro Gold Weekly Friday Option contracts shall be subject to the general rules of the Exchange insofar as applicable.

1258101. OPTION CHARACTERISTICS

The number of weeks open for trading at a given time shall be determined by the Exchange.

125101.A. Trading Schedule

The hours of trading for this contract shall be determined by the Exchange.

125101.B. Trading Unit

A Gold Weekly call option traded on the Exchange represents an option to assume a long position in the closest to expiry of a non-spot February, April, June, August, October, or December Micro Gold Futures contract, unless such expiration day is after the expiry of the associated monthly option for those months. In such case, the contract will be exercisable into a future in the second closest to expiry February, April, June, August, October, or December Micro Gold Futures contract. A Gold Weekly put option traded on the Exchange represents an option to assume a short position in the closest to expiry of a non-spot February, April, June, August, October, or December Micro Gold Futures contract, unless such expiration day is after the expiry of the associated monthly option for those months. In such case, the contract will be exercisable into a future in the second closest to expiry February, April, June, August, October, or December Micro Gold Futures contract.

125101.C. Price Increments

Prices shall be quoted in dollars and cents per ounce and prices shall be in multiples of \$0.10 per troy ounce. The minimum price increment will be \$0.01.

125101.D. Position Limits, Exemptions, Position Accountability and Reportable Levels

The applicable position limits and/or accountability levels, in addition to the reportable levels, are set forth in the Position Limit, Position Accountability and Reportable Level Table in the Interpretations & Special Notices Section of Chapter 5.

A Person seeking an exemption from position limits for bona fide commercial purposes shall apply to the Market Regulation Department on forms provided by the Exchange, and the Market Regulation Department may grant qualified exemptions in its sole discretion.

Refer to Rule 559 for requirements concerning the aggregation of positions and allowable exemptions from the specified position limits.

125101.E. Termination of Trading

Micro Gold Weekly Monday Option

Options will expire at the close of trading on a Monday schedule. If such Monday is an Exchange holiday, the weekly option will not be listed for trading.

Micro Gold Weekly Wednesday Option

Options will expire at the close of trading on a Wednesday schedule. If such Wednesday is an Exchange holiday, the weekly option will not be listed for trading.

Micro Gold Weekly Friday Option

Options will expire at the close of trading on a Friday schedule. If such Friday is an Exchange holiday, the weekly option will not be listed for trading.

125101.F. Type Option

The option is an American-style option which can be exercised on any Business Day prior to and until expiration day.

125102.

EXERCISE PRICES AND CHARACTERISTICS

Transactions shall be conducted for option contracts as set forth in Rule 300.20.

125103.

SPECIAL PRICE FLUCTUATION LIMITS

At the commencement of each trading day, the contract shall be subject to special fluctuation limits as set forth in Rule 589 and in the Special Price Fluctuation Limits and Daily Price Limits Table in the Interpretations & Special Notices Section of Chapter 5.

Exhibit B

COMEX Rulebook

Chapter 5

(“Trading Qualifications and Practices”)

Position Limits, Position Accountability and Reportable Level Table

(attached under separate cover)

Exhibit C
Exchange Fees

Exchange Fees	Member	Non-Member
CME Globex	\$0.37	\$0.75
EFP	\$0.00	\$0.00
Block	\$0.40	\$0.83
EFR/EOO	\$1.68	\$2.00
Processing Fees		
	Member	Non-Member
Futures from Exercise/Assignment	\$0.37	\$0.75
	House Account	Customer Account
Option Exercise/Assignment Notice	\$0.20	\$0.43
Facilitation Fee	\$0.60	
Give-Up Surcharge	\$0.05	
Position Adjustment/Position Transfer	\$0.10	
COMEX Lessee Surcharge	\$0.50	
COMEX Lessee Trading Fee	\$0.125	

Exhibit D
COMEX Rulebook
Chapter 5
(“Trading Qualifications and Practices”)

Rule 588.H. (“Globex Non-Reviewable Trading Ranges”) Table

Metals Options	Globex Symbol	Globex Non-Reviewable Ranges (NRR)
Micro Gold Option	OMG	The greater of the following: •Delta multiplied by the underlying futures non-reviewable range •20% of premium up to ¼ of the underlying futures non-reviewable range •2 ticks
Micro Gold Weekly Monday Option	1MG-5MG	
Micro Gold Weekly Wednesday Option	1WG-5WG	
Micro Gold Weekly Friday Option	1FG-5FG	

Exhibit E
COMEX Rulebook
Chapter 5
(“Trading Qualifications and Practices”)

Rule 589. Special Price Fluctuation Limits and Daily Price Limits Table

Product	Rulebook Chapter	Commodity Code	Primary/Associated	Associated With	Dynamically Calculated Variant	Daily Price Limit
Micro Gold Option	124	OMG	Associated	GC		
Micro Gold Weekly Monday Option	125	1MG-5MG	Associated	GC		
Micro Gold Weekly Wednesday Option	125	1WG-5WG	Associated	GC		
Micro Gold Weekly Friday Option	125	1FG-5FG	Associated	GC		

Exhibit F
COMEX Rulebook
Chapter 300
(“Options Contracts”)

Rule 300.20.- Strike Price Listing and Exercise Procedure Table

(attached under separate cover)

Commodity Code	COMEX Globex Code	Product Name	Product Group	Product Subgroup	Exchange	Rulebook Chapter	Strike Price Listing Rule	Option Style	Contrary Instructions	Margin Style	Exerc All-the-Money Cts Trade Priorities	Underlying Commodity Code	Underlying Product Name
1FG-5FG	1FG-5FG	Micro Gold Weekly Friday Option	Metals	Precious	COMEX	125	Minimum 40 strikes at \$5.00 per troy ounce increment above and below the at-the-money strike.	American	No	Equity	Exercise Calls Abandon Puts	MGC	Micro Gold Futures
1MG-5MG	1MG-5MG	Micro Gold Weekly Monday Option	Metals	Precious	COMEX	125	Minimum 40 strikes at \$5.00 per troy ounce increment above and below the at-the-money strike.	American	No	Equity	Exercise Calls Abandon Puts	MGC	Micro Gold Futures
1WG-5WG	1WG-5WG	Micro Gold Weekly Wednesday Option	Metals	Precious	COMEX	125	Minimum 40 strikes at \$5.00 per troy ounce increment above and below the at-the-money strike.	American	No	Equity	Exercise Calls Abandon Puts	MGC	Micro Gold Futures
OMG	OMG	Micro Gold Option	Metals	Precious	COMEX	124	Minimum 40 strikes at \$5.00 per troy ounce increment above and below the at-the-money strike then 10 strikes at \$10.00 per troy ounce increment above and below the highest and lowest \$5.00 increment strike then 8 strikes at \$25.00 per troy ounce increment above and below the highest and lowest \$10.00 increment strike.	American	No	Equity	Exercise Calls Abandon Puts	MGC	Micro Gold Futures

Exhibit G

Cash Market Overview and Analysis of Deliverable Supply

Appendix C to part 38 of the Commission's regulations defines deliverable supply as "the quantity of the commodity meeting the contract's delivery specifications that can reasonably be expected to be readily available to short traders and saleable by long traders at its market value in normal cash marketing channels at the derivative contract's delivery points during the specified delivery period, barring abnormal movement in interstate commerce."

The Contracts are referenced contracts that exercise into the Micro Gold Futures contract. These options contracts expire prior to the spot month limit taking affect but will be subject to federal position limits during the spot month upon exercise. The core referenced futures contract is the Gold Futures contract (Commodity Code: GC; Rulebook Chapter 113).

Deliverable supply is defined as material that is readily available and meets the Exchange futures contracts' specifications in terms of shape, weight, and quality. As general practice, COMEX has relied on inventory stored in Exchange approved facilities to support spot month position limits of its physically delivered futures contracts. The proposal for spot month position limits for the Contracts is based on the deliverable supply analysis of their respective futures contracts as the option contracts will aggregate into the futures contracts for position limit purposes.

Stock Reporting Requirements

Pursuant to the Rules of the Exchange, each depository is required to report to the Exchange the level of Exchange grade inventory on a daily basis. The inventory shall include eligible and registered metal. Eligible metal shall mean all such metal that is acceptable for delivery against the respective Exchange futures contract (i.e., which meets the specifications and approved brands of the respective futures contract) for which a warrant has not been issued. Registered metal shall mean eligible metal for which a warrant has been issued. Specifically, on a daily basis, each depository is required to provide the Exchange (1) the total quantity of registered metal stored at the depository, (2) the total quantity of eligible metal stored at the depository, and (3) the quantity of eligible metal and registered metal received and withdrawn from the depository.

The inventory levels at all Exchange-approved depositories for gold are made publicly available daily on the Exchange website.¹ Further, the Rules of the Exchange require an independent inventory audit to be performed annually to provide a comprehensive reconciliation of stocks stored at depositories with records maintained by both the Exchange and the depository.²

Deliverable Supply Analysis

Gold

The Exchange determined at this time to base its estimates of deliverable supply of gold on registered stock as well as such gold stock meeting all specifications of the Gold futures contract stored at Exchange approved depositories. The Exchange recognizes that gold is used as an investment vehicle and as such some gold stock may be held as a long-term investment. While surveys conducted indicated no clear consensus as to how much gold is dedicated to long term investments, the Exchange, in an effort to

¹ <http://www.cmegroup.com/market-data/reports/registrar-reports.html>

² <https://www.cmegroup.com/rulebook/NYMEX/1/7.pdf>

represent a conservative deliverable supply that may be readily available for delivery, made a determination to discount from its estimate of deliverable supply 50% of its reported eligible gold at this time.

As of August 31, 2023, the gold inventory held at Exchange approved depositories totaled 21,389,738.459 troy ounces, the equivalent of 213,897 Gold futures contracts (contract size = 100 troy ounces). Exchange practice is to set spot month position limits at a maximum level of 25% of deliverable supply over the most recent three-year period. Deliverable supply is calculated as the sum of total reported registered gold with total reported eligible gold, after taking a 50% discount for eligible gold. Table 1 below shows the monthly average gold stocks in Exchange approved depositories for the most recent three-year period in contract equivalents.

Inventory in Exchange Approved Depositories for Gold

Table 1. below provides the monthly inventory average of each of registered and eligible gold stored at Exchange approved depositories for the period beginning September 2020 through August 2023.

Over the September 2020 through August 2023, the monthly average registered gold was 157,626 futures equivalent contracts. The monthly average eligible gold was 76,683 futures equivalent contracts accounting for a 50% discount. Based on the foregoing, the Exchange estimates monthly deliverable supply for the Gold Futures (GC) contract at approximately 234,309 futures equivalent contracts.

Table 1. Monthly Average Stock Levels at Exchange Approved Depositories for Gold (in Contract Equivalents)

Month	Registered	Eligible	Total
Sep-20	161,253	102,879	264,131
Oct-20	176,351	99,284	275,635
Nov-20	173,478	100,366	273,844
Dec-20	187,778	94,726	282,504
Jan-21	190,268	97,361	287,630
Feb-21	195,385	99,087	294,472
Mar-21	183,689	98,028	281,718
Apr-21	178,751	88,797	267,548
May-21	176,461	84,526	260,986
Jun-21	185,605	82,265	267,870
Jul-21	186,556	83,709	270,266
Aug-21	187,036	81,271	268,307
Sep-21	182,929	79,071	262,000
Oct-21	176,621	79,775	256,396
Nov-21	176,586	78,369	254,956
Dec-21	177,723	80,997	258,721
Jan-22	175,850	79,716	255,566
Feb-22	172,939	76,879	249,818
Mar-22	175,910	80,987	256,897
Apr-22	183,227	87,834	271,061
May-22	180,960	88,305	269,265
Jun-22	175,555	82,355	257,911

Jul-22	160,863	78,461	239,324
Aug-22	143,286	72,803	216,089
Sep-22	132,790	68,757	201,547
Oct-22	121,216	67,611	188,828
Nov-22	111,876	64,007	175,883
Dec-22	115,639	58,759	174,398
Jan-23	110,896	57,949	168,845
Feb-23	110,096	54,645	164,741
Mar-23	111,227	51,541	162,768
Apr-23	122,902	48,623	171,525
May-23	122,340	51,960	174,300
Jun-23	117,201	54,688	171,889
Jul-23	118,574	52,193	170,767
Aug-23	114,721	51,988	166,709
3-Year Average	157,626	76,683	234,309

Source: CME Group

The current spot month position limit of 6,000 contracts represents 2.6% of the estimated monthly deliverable supply. Therefore, the proposed spot month position limit for the Micro Gold Option, Micro Gold Weekly Monday Option, Micro Gold Weekly Wednesday Option and Micro Gold Weekly Friday Option is 6,000 contracts as these contracts would aggregate into Gold Futures, which is a referenced contract, for position limit purposes.