

RECEIVED
C.F.T.C.

2005 FEB -2 PM 4: 41

February 2, 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 #05.13 (Listing of Additional Strike Prices for the
Gold, Copper, Heating Oil, Unleaded Gasoline, Natural Gas and Crude
Oil 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, Unleaded Gasoline, Natural Gas and Crude Oil option contracts as detailed below:

- (A) On January 28, 2005, the Exchange added a call and a put:
- (1) at the strike price of 148 for the April 2005 contract month of the Copper option contract;
 - (2) at the strike price of 8050 the June 2005 contract month of the Natural Gas option contract;
 - (3) at the strike price of 13000 for the February 2006 contract month of the Natural Gas option contract;
- (B) On January 31, 2005, the Exchange added a call and a put:
- (4) at the strike price of 17300 for the March 2005 contract month of the Unleaded Gasoline option contract;
 - (5) at the strike price of 156 for the April 2005 contract month of the Copper option contract;

(6) at the strike price of 17300 for the May 2005 contract month of the Unleaded Gasoline option contract;

(7) at the strike price of 16200 for the May 2005 contract month of the Heating Oil option contract;

(8) at the strike price of 6300 for the July 2005 contract month of the Crude Oil option contract;

(9) at the strike price of 580 for the December 2005 contract month of the Gold option contract;

(C) On February 1, 2005, the Exchange added a call and a put:

(10) at the strike price of 170 for the December 2005 contract month of the Copper option contract;

(D) On February 2, 2005, the Exchange added a call and a put:

(11) at the strike price of 17800 for the May 2005 contract month of the Unleaded Gasoline option contract;

(12) at the strike price of 15000 for the December 2005 contract month of the Natural Gas option contract; and

(13) at the strike price of 6900 for the June 2006 contract month of the Natural Gas 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.

CFTC Commissioners
February 2, 2005
Page 3

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