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February 17, 2005

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

- (A) On February 14, 2005, the Exchange added a call and a put:
1. at the strike prices of 875 and 900 for the April 2005 contract month of the Silver option contract;
 2. at the strike prices of 16800 and 16900 the July 2005 contract month of the Unleaded Gasoline option contract;
 3. at the strike price of 6200 for the September 2005 contract month of the Crude Oil option contract;
 4. at the strike prices of 825 and 925 for the July 2006 contract month of the Silver option contract;
 5. at the strike price of 1500 for the December 2007 contract month of the Silver option contract;

- (B) On February 15, 2005, the Exchange added a call and a put:
6. at the strike price of 17300 for the June 2005 contract month of the Unleaded Gasoline option contract;
 7. at the strike price of 18300 for the July 2005 contract month of the Unleaded Gasoline option contract;
 8. at the strike price of 1500 for the September 2005 contract month of the Silver option contract;
- (C) On February 16, 2005, the Exchange added a call and a put:
9. at the strike price of 134 for the May 2005 contract month of the copper option contract;
 10. at the strike price of 8250 for the December 2005 contract month of the Natural Gas option contract;
 11. at the strike price of 2000 for the March 2006 contract month of the Natural Gas One month Calendar Spread option contract;
- (D) On February 17, 2005, the Exchange added a call and a put:
12. at the strike price of -65 for the March 2005 contract month of the Crude Oil One month Calendar Spread option contract;
 13. at the strike prices of 142 and 152 for the April 2005 contract month of the Copper option contract;
 14. at the strike price of 17600 for the June 2005 contract month of the Unleaded Gasoline option contract;
 15. at the strike price of 18200 for the June 2005 contract month of the Heating Oil option contract;
 16. at the strike price of 510 for the October 2005 contract month of the Gold option contract; and
 17. at the strike prices of 350 and 400 for the December 2005 contract month of the WTI Twelve month Calendar Spread option contract.

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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.

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