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April 27, 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 #05.75 (Listing of Additional Strike Prices for the  
Copper, Silver, Unleaded Gasoline, Natural Gas, Crude Oil and Related  
Calendar and Average Spread Option Contracts)

Dear CFTC Commissioners:

Pursuant to 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 Copper, Silver, Unleaded Gasoline, Natural Gas, Crude Oil and related Calendar and Average Spread option contracts as detailed below:

- (A) On April 22, 2005, the Exchange added a call and a put:
1. at the strike price of -125 for the June 2005 contract month of the WTI Crude Oil One month Calendar Spread option contract;
  2. at the strike price of 162 for the June 2005 contract month of the Copper option contract;
  3. at the strike prices of 152 and 156 for the July 2005 contract month of the Copper option contract;
  4. at the strike price of 9050 for the August 2005 contract month of the Natural Gas option contract;
  5. at the strike prices of 19600 and 19900 for the August 2005 contract month of the Unleaded Gasoline option contract;
  6. at the strike price of 7700 for the September 2005 contract month of the Crude Oil option contract;

7. at the strike price of 20700 for the September 2005 contract month of the Unleaded Gasoline option contract;

8. at the strike price of 9400 for the October 2005 contract month of the Natural Gas option contract;

9. at the strike price of 7350 for the December 2005 contract month of the Natural Gas option contract;

(B) On April 25, 2005, the Exchange added a call and a put:

10. at the strike price of -130 for the June 2005 contract month of the WTI Crude Oil One month Calendar Spread option contract;

11. at the strike price of 8600 for the June 2005 contract month of the Natural Gas option contract;

12. at the strike price of 128 for the July 2005 contract month of the Copper option contract;

13. at the strike price of 22300 for the July 2005 contract month of the Unleaded Gasoline option contract;

14. at the strike prices of 19400, 20600 and 21600 for the August 2005 contract month of the Unleaded Gasoline option contract;

15. at the strike price of 16000 for the January 2006 contract month of the Natural Gas option contract;

16. at the strike price of 8450 for the March 2006 contract month of the Natural Gas option contract;

17. at the strike price of 1300 for the March 2006 contract month of the Silver option contract;

18. at the strike price of 8950 for the April 2006 contract month of the Natural Gas option contract;

19. at the strike price of 8850 for the May 2006 contract month of the Natural Gas option contract;

20. at the strike price of 8950 for the June 2006 contract month of the Natural Gas option contract;

(C) On April 26, 2005, the Exchange added a call and a put:

21. at the strike prices of 138 and 142 for the July 2005 contract month of the Copper option contract;

22. at the strike price of 18900 for the September 2005 contract month of the Unleaded Gasoline Average Price option contract;

23. at the strike price of 18900 for the October 2005 contract month of the Unleaded Gasoline Average Price option contract;

24. at the strike price of 9800 for the November 2005 contract month of the Natural Gas option contract;

(D) On April 27, 2005, the Exchange added a call and a put:

25. at the strike price of 144 for the July 2005 contract month of the Copper option contract;

26. at the strike prices of 19800 and 20200 for the August 2005 contract month of the Unleaded Gasoline option contract;

27. at the strike price of 15000 for the November 2005 contract month of the Natural Gas option contract; and

28. at the strike price of 7100 for the June 2006 contract month of the Natural Gas option contract.

Pursuant to the terms of 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 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