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May 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 #05.81 (Listing of Additional Strike Prices for the  
Gold, Silver, Natural Gas, Crude Oil and Related Calendar Spread Option  
Contracts)

Dear CFTC Commissioners:

Pursuant to COMEX Rule 15.03(C), COMEX Rule 16.03 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, Natural Gas, Crude Oil and related Calendar Spread option contracts as detailed below:

- (A) On May 4, 2005, the Exchange added a call and a put:
1. at the strike prices of -185 and -250 for the June 2005 contract month of the WTI Crude Oil One month Calendar Spread option contract;
  2. at the strike price of 7850 for the March 2006 contract month of the Natural Gas option contract;
  3. at the strike price of 8250 for the June 2006 contract month of the Natural Gas option contract;
  4. at the strike price of 8250 for the September 2005 contract month of the Natural Gas option contract;
  5. at the strike price of 925 for the December 2006 contract month of the Silver option contract;
  6. at the strike price of 850 for the June 2007 contract month of the Gold option contract;

(B) On May 5, 2005, the Exchange added a call and a put:

7. at the strike price of 1200 for the July 2006 contract month of the Silver option contract; and

(C) On May 6, 2005, the Exchange added a call and a put:

8. at the strike price of 7300 for the December 2005 contract month of the Crude Oil option contract.

Pursuant to the terms of COMEX Rule 15.03(C), COMEX Rule 16.03 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 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