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July 14, 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 #05.122 (Listing of Additional Strike Prices for the  
Gold, Silver, Copper, Heating Oil, Heating Oil Average Price, Unleaded  
Gasoline, Natural Gas, 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, Heating Oil, Heating Oil Average Price, Unleaded Gasoline, Natural Gas, Crude Oil and Calendar Spread option contracts as detailed below:

- (A) On July 11, 2005, the Exchange added a call and a put:
1. at the strike price of 9350 for the March 2006 contract month of the Natural Gas option contract;
- (B) On July 12, 2005, the Exchange added a call and a put:
2. at the strike price of 9850 for the August 2005 contract month of the Natural Gas option contract;
  3. at the strike price of -110 for the August 2005 contract month of the WTI Crude Oil One month Calendar Spread option contract;
  4. at the strike price of 162 for the September 2005 contract month of the Copper option contract;
  5. at the strike price of 23700 for the October 2005 contract month of the Heating Oil option contract;

6. at the strike price of 9450 for the November 2005 contract month of the Natural Gas option contract;

7. at the strike price of 7400 for the December 2005 contract month of the Crude Oil option contract;

8. at the strike price of 8950 for the December 2005 contract month of the Natural Gas option contract;

9. at the strike prices of 21900 and 22400 for the December 2005 contract month of the Heating Oil option contract;

10. at the strike price of 11000 for the July 2006 contract month of the Crude Oil option contract;

11. at the strike price of 11000 for the August 2006 contract month of the Crude Oil option contract;

12. at the strike price of 8050 for the September 2006 contract month of the Natural Gas option contract;

13. at the strike price of 7550 for the March 2008 contract month of the Natural Gas option contract;

14. at the strike price of 7550 for the June 2008 contract month of the Natural Gas option contract;

15. at the strike price of 7550 for the September 2008 contract month of the Natural Gas option contract;

16. at the strike price of 7550 for the December 2008 contract month of the Natural Gas option contract;

(C) On July 13, 2005, the Exchange added a call and a put:

17. at the strike price of 20100 for the October 2005 contract month of the Unleaded Gasoline option contract;

18. at the strike prices of 20300 and 20400 for the October 2005 contract month of the Unleaded Gasoline option contract;

19. at the strike prices of 9600 and 14000 for the November 2005 contract month of the Natural Gas option contract;

20. at the strike price of 20700 for the November 2005 contract month of the Heating Oil option contract;

21. at the strike prices of 8850 and 11200 for the December 2005 contract month of the Natural Gas option contract;

22. at the strike price of 11600 for the January 2006 contract month of the Natural Gas option contract;

23. at the strike price of 11600 for the February 2006 contract month of the Natural Gas option contract;

24. at the strike price of 550 for the March 2006 contract month of the Silver option contract;

25. at the strike price of 7750 for the September 2006 contract month of the Natural Gas option contract;

(D) On July 14, 2005, the Exchange added a call and a put:

26. at the strike price of 390 for the September 2005 contract month of the Gold option contract;

27. at the strike price of 20200 for the September 2005 contract month of the Unleaded Gasoline option contract;

28. at the strike price of 7950 for the September 2006 contract month of the Natural Gas option contract;

29. at the strike price of 17700 for the October 2007 contract month of the Heating Oil Average Price option contract;

30. at the strike price of 17700 for the November 2007 contract month of the Heating Oil Average Price option contract; and

31. at the strike price of 17700 for the December 2007 contract month of the Heating Oil Average Price 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