



Commodity Futures Trading Commission

Hearing on Speculative Position Limits in Energy Futures Markets

July 28, 2009



Current Practices

July 28, 2009

Category	Sample Contracts	Speculative Position Limits (●) or Position Accountability (📖)		
		Spot Month	Single Month	All Months Combined
CFTC Speculative Position Limits				
Federal limits	Corn, oats, soybeans, soybean oil, soybean meal, wheat, and cotton	●	●	●
Limits and Levels Set by Exchanges				
Energy	NYMEX Crude Oil, Natural Gas, Heating Oil, and Gasoline; ICE U.K. WTI	●	📖	📖
Metals	COMEX Gold and Silver	●	📖	📖



Number of NYMEX Energy Traders
Over Position Accountability Levels
in Crude Oil, Natural Gas, Heating Oil, and Gasoline
July 1, 2008 to June 30, 2009

Trader Category	Single Month	All-Month Combined
Commercial/Physical	20	13
Risk Management/Swap	13	13
Managed Money	28	18
Other Non-Commercial	11	4
Total	69	46



Number of NYMEX Energy Traders Over Position Accountability Levels July 1, 2008 to June 30, 2009

Contract Market	Accountability Level (Contracts)		Number of Traders	Avg. # of Days Level Exceeded	Average Position
NYMEX WTI Crude Oil	Single Month	10,000	43	87	20,059
	All-Months-Combined	20,000	23	85	33,449
NYMEX Natural Gas	Single Month	6,000	40	84	11,720
	All-Months-Combined	12,000	26	80	44,835
NYMEX No. 2 Heating Oil	Single Month	5,000	17	47	7,050
	All-Months-Combined	7,000	13	75	17,346
NYMEX RBOB Gasoline	Single Month	5,000	24	53	7,566
	All-Months-Combined	7,000	16	49	11,407

* Physical delivery futures positions are aggregated with options on physical delivery futures contracts.



Number of NYMEX Energy Traders
Over Position Accountability Levels
July 1, 2008 to June 30, 2009

NYMEX Contract Market	Nearby Futures			
	Traders > 10% of OI	Traders > 20% of OI	Traders > 30% of OI	Max % of OI
WTI Crude Oil	2	-	-	14%
Natural Gas	13	4	3	33%
Heating Oil	4	-	-	18%
Gasoline	8	1	-	23%

Note: “Max % of OI” represents the largest trader’s position, as a percentage of the open interest in that single contract month.



Number of NYMEX Energy Traders
Over Position Accountability Levels
July 1, 2008 to June 30, 2009

NYMEX Contract Market	1st Deferred Futures			
	Traders > 10% of OI	Traders > 20% of OI	Traders > 30% of OI	Max % of OI
WTI Crude Oil	5	-	-	18%
Natural Gas	14	5	1	40%
Heating Oil	11	-	-	18%
Gasoline	12	2	-	29%

Note: “Max % of OI” represents the largest trader’s position, as a percentage of the open interest in that single contract month.



NYMEX Spot Month Speculative Position Limit Exemptions As of July 21, 2009

Contract	Number of Exemptions	Average Size of Exemption
Crude Oil	37	5,693
Heating Oil	36	2,445
Gasoline	37	2,578
Natural Gas	43	2,930

NYMEX spot month speculative position limits:

- 3,000 contracts for Crude Oil
- 1,000 contracts for others
- Applies during last three days of trading



Federal Speculative Position Exemptions for Agricultural Traders As of July 21, 2009

Contract	Number of Exemptions by Category		
	1.Physical Inventory/ Sales	2.Physical Anticipated Needs	3.Risk Management/ Swap
Chicago Board of Trade			
Wheat	12	3	14
Corn	10	4	15
Soybeans	10	5	13
Soybean Oil	10	6	11
Soybean Meal	8	4	4
ICE Futures U.S.			
Cotton	13	0	11