

RECEIVED  
C.F.T.C.

2005 MAR -2 PM 4:41

March 2, 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 #05.32 (Listing of Additional Strike Prices for the  
Gold, Copper, Unleaded Gasoline, Natural Gas, Crude Oil, Gasoline  
Crack, Heating Oil Average Price and Related Calendar Spread Option  
Contracts)

Dear CFTC Commissioners:

Pursuant to COMEX Rule 15.03(c), 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, Copper, Unleaded Gasoline, Natural Gas, Crude Oil, Gasoline Crack, Heating Oil Average Price and related Calendar Spread option contracts as detailed below:

- (A) On February 25, 2005, the Exchange added a call and a put:
1. at the strike price of 17200 for the May 2005 contract month of the Unleaded Gasoline option contract;
  2. at the strike price of 6850 the September 2005 contract month of the Natural Gas option contract;
- (B) On February 28, 2005, the Exchange added a call and a put:
3. at the strike price of 15900 for the April 2005 contract month of the Heating Oil Calendar Spread option contract;
  4. at the strike prices of 17700, 17800 and 18900 for the June 2005 contract month of the Unleaded Gasoline option contract;
  5. at the strike price of 8600 for the July 2005 contract month of the Natural Gas option contract;

6. at the strike price of 8700 for the August 2005 contract month of the Natural Gas option contract;

7. at the strike price of 9100 for the November 2005 contract month of the Natural Gas option contract;

8. at the strike prices of 7700 and 9100 for the December 2005 contract month of the Natural Gas option contract;

9. at the strike price of 148 for the December 2005 contract month of the Copper option contract;

10. at the strike price of 1100 for the March 2006 contract month of the Natural Gas One month Calendar Spread option contract;

11. at the strike price of 7200 for the March 2006 contract month of the Crude Oil option contract;

12. at the strike price of 7400 for the April 2006 contract month of the Crude Oil option contract;

(C) On March 1, 2005, the Exchange added a call and a put:

13. at the strike price of 136 for the April 2005 contract month of the Copper option contract;

14. at the strike price of 600 for the April 2005 contract month of the Unleaded Gasoline Crack option contract;

15. at the strike prices of 480 and 500 for the May 2005 contract month of the Gold option contract;

16. at the strike prices of 17100 and 17700 for the July 2005 contract month of the Unleaded Gasoline option contract;

17. at the strike price of 8850 for the March 2006 contract month of the Natural Gas option contract;

18. at the strike price of 8850 for the April 2006 contract month of the Natural Gas option contract;

(D) On March 2, 2005, the Exchange added a call and a put:

19. at the strike price of 164 for the April 2005 contract month of the Copper option contract;

20. at the strike price of 18400 for the June 2005 contract month of the Unleaded Gasoline option contract;

21. at the strike price of 16200 for the July 2005 contract month of the Heating Oil Average Price option contract; and

22. at the strike price of 8050 for the September 2005 contract month of the Natural Gas option contract.

Pursuant to the terms of COMEX Rule 15.03(c), 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 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