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May 24, 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 #05.90 (Listing of Additional Strike Prices for the
Copper, Natural Gas, Heating Oil and Related Calendar Spread Option
Contracts)

Dear CFTC Commissioners:

Pursuant to 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, Natural Gas, Heating Oil and related Calendar Spread option contracts as detailed below:

- A. On May 19 2005, the Exchange added a call and a put:
 - 1. at the strike price of -125 for the July 2005 contract month of the WTI Crude Oil One month Calendar Spread option contract;

- B. On May 24, 2005, the Exchange added a call and a put:
 - 2. at the strike prices of 124 and 136 for the September 2005 contract month of the Copper option contract;
 - 3. at the strike price of 20900 for the November 2005 contract month of the Heating Oil option contract; and
 - 4. at the strike prices of 5900 and 8750 for the September 2006 contract month of the Natural Gas option contract.

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Pursuant to the terms of 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 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