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June 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 #05.101 (Listing of Additional Strike Prices for the  
Copper, Silver, Heating Oil, Crude Oil, Unleaded Gasoline and Natural  
Gas Option Contracts)

Dear CFTC Commissioners:

Pursuant to 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 Copper, Silver, Heating Oil, Crude Oil, Unleaded Gasoline and Natural Gas option contracts as detailed below:

- (A) On June 2, 2005, the Exchange added a call and a put:
1. at the strike price of 148 for the August 2005 contract month of the Copper option contract;
  2. at the strike prices of 126 and 148 for the September 2005 contract month of the Copper option contract;
  3. at the strike prices of 19800 and 19900 for the September 2005 contract month of the Heating Oil option contract;
  4. at the strike prices of 7200, 7300 and 7400 for the October 2005 contract month of the Crude Oil option contract;
  5. at the strike price of 19300 for the November 2005 contract month of the Heating Oil option contract;

6. at the strike price of 13500 for the March 2006 contract month of the Heating Oil option contract;

(B) On June 3, 2005, the Exchange added a call and a put:

7. at the strike prices of 19800, 20100 and 21100 for the September 2005 contract month of the Unleaded Gasoline option contract;

8. at the strike price of 7200 for the September 2005 contract month of the Crude Oil option contract;

9. at the strike price of 19600 for the October 2005 contract month of the Unleaded Gasoline option contract;

10. at the strike prices of 19900 and 20400 for the November 2005 contract month of the Heating Oil option contract;

11. at the strike price of 19700 for the March 2006 contract month of the Heating Oil option contract;

12. at the strike prices of 14000 and 16000 for the March 2006 contract month of the Natural Gas option contract;

13. at the strike price of 7850 for the December 2006 contract month of the Natural Gas option contract;

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

14. at the strike price of 162 for the July 2005 contract month of the Copper option contract;

15. at the strike price of 900 for the August 2005 contract month of the Silver option contract;

16. at the strike price of 19600 for the August 2005 contract month of the Heating Oil option contract;

17. at the strike price of 146 for the September 2005 contract month of the Copper option contract;

18. at the strike prices of 18900,19100, 19600, 19700 and 20200 for the September 2005 contract month of the Heating Oil option contract;

19. at the strike price of 22800 for the December 2005 contract month of the Heating Oil option contract;

20. at the strike price of 10200 for the December 2005 contract month of the Natural Gas option contract;

21. at the strike prices of 17000, 17500 and 19000 for the March 2006 contract month of the Natural Gas option contract; and

22. at the strike price of 9000 for the March 2007 contract month of the Natural Gas option contract.

Pursuant to the terms of 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 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