

August 1, 2005

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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 #05.130 (Listing of Additional Strike Prices for the
Silver, Copper, Crude Oil, Natural Gas, Heating Oil, Unleaded Gasoline
and Related Calendar Spread 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 Silver, Copper, Crude Oil, Natural Gas, Heating Oil, Unleaded Gasoline and related Calendar Spread option contracts as detailed below:

- (A) On July 27, 2005, the Exchange added a call and a put:
1. at the strike price of 20000 for the September 2005 contract month of the Natural Gas option contract;
 2. at the strike price of 20000 for the October 2005 contract month of the Natural Gas option contract;
- (B) On July 28, 2005, the Exchange added a call and a put:
3. at the strike price of 182 for the September 2005 contract month of the Copper option contract;
 4. at the strike price of -120 for the December 2005 contract month of the WTI Crude Oil One month Calendar Spread option contract;
 5. at the strike price of -120 for the January 2006 contract month of the WTI Crude Oil One month Calendar Spread option contract;
 6. at the strike price of 630 for the March 2006 contract month of the Silver option contract;

- (C) On July 29, 2005, the Exchange added a call and a put:
7. at the strike price of 15000 for the October 2005 contract month of the Natural Gas option contract;
 8. at the strike price of 26000 for the October 2005 contract month of the Unleaded Gasoline option contract;
 9. at the strike price of 8400 for the November 2005 contract month of the Crude Oil option contract;

- (D) On August 1, 2005, the Exchange added a call and a put:
10. at the strike price of 164 for the September 2005 contract month of the Copper option contract;
 11. at the strike price of 21200 for the October 2005 contract month of the Heating Oil option contract; and
 12. at the strike price of 22600 for the November 2005 contract month of the Heating Oil 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.

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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