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June 22, 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 #05.109 (Listing of Additional Strike Prices for the
Gold, Copper, Heating Oil, Crude Oil, Unleaded Gasoline and Natural
Gas 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, Heating Oil, Crude Oil, Unleaded Gasoline and Natural Gas option contracts as detailed below:

- (A) On June 17, 2005, the Exchange added a call and a put:
1. at the strike price of 19900 for the August 2005 contract month of the Heating Oil option contract;
 2. at the strike prices of 7100 and 7300 for the September 2005 contract month of the Crude Oil option contract;
 3. at the strike price of 9800 for the October 2005 contract month of the Natural Gas option contract;
 4. at the strike price of 21300 for the November 2005 contract month of the Heating Oil option contract;
 5. at the strike prices of 21400 and 22300 for the December 2005 contract month of the Heating Oil option contract;
 6. at the strike price of 19600 for the January 2006 contract month of the Heating Oil option contract;

7. at the strike price of 540 for the April 2006 contract month of the Gold option contract;

8. at the strike price of 10400 for the October 2006 contract month of the Crude Oil option contract;

9. at the strike price of 10000 for the December 2006 contract month of the Crude Oil option contract;

(B) On June 20, 2005, the Exchange added a call and a put:

10. at the strike price of 7200 for the August 2005 contract month of the Crude Oil option contract;

11. at the strike prices of 19800 and 20800 for the October 2005 contract month of the Heating Oil option contract;

12. at the strike price of 12500 for the November 2005 contract month of the Natural Gas option contract;

13. at the strike price of 12500 for the December 2005 contract month of the Natural Gas option contract;

14. at the strike price of 570 for the December 2006 contract month of the Gold option contract;

(C) On June 21, 2005, the Exchange added a call and a put:

15. at the strike price of 138 for the August 2005 contract month of the Copper option contract;

16. at the strike prices of 7400 and 7800 for the September 2005 contract month of the Crude Oil option contract;

17. at the strike prices of 7700 and 7800 for the October 2005 contract month of the Crude Oil option contract;

18. at the strike price of 19900 for the October 2005 contract month of the Unleaded Gasoline option contract;

19. at the strike prices of 21600 and 21800 for the November 2005 contract month of the Heating Oil option contract;

20. at the strike price of 7200 for the December 2005 contract month of the Crude Oil option contract;

21. at the strike price of 7600 for the June 2006 contract month of the Natural Gas option contract;

22. at the strike price of 200 for the July 2006 contract month of the Copper option contract;

(D) On June 22, 2005, the Exchange added a call and a put:

23. at the strike price of 178 for the September 2005 contract month of the Copper option contract;

24. at the strike price of 19700 for the November 2005 contract month of the Heating Oil option contract; and

25. at the strike price of 20600 for the December 2005 contract month of the Heating Oil 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.

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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