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May 27, 2011

Mr. David Stawick

Office of the Secretariat
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, DC 20581

**RE: Section 5c(c)(1), Part 40.6 – Rule Certification
NYMEX Rule 855 (“Offsetting Different Sized Futures Positions”)
NYMEX Submission No. 11-213**

Dear Mr. Stawick:

The New York Mercantile Exchange, Inc. (“NYMEX” or “Exchange”) hereby notifies the Commodity Futures Trading Commission (“CFTC” or “Commission”) of revisions to NYMEX Rule 855 (“Offsetting Different Sized Futures Positions”) which will permit, pursuant to the conditions specified in the Rule, for a 4:1 offset of Henry Hub Natural Gas Penultimate Financial futures and Henry Hub Natural Gas Look-Alike Penultimate Financial futures. These contracts are identical in every respect other than the contract unit, with the former contract sized at 2,500 MMBtu (million British thermal units) and the latter contract sized at 10,000 MMBtu.

The revisions appear below, with additions underscored. The Exchange certifies that the amendments comply with the Commodity Exchange Act and regulations thereunder. There were no substantive opposing views to this proposal. The amendments will be effective on Monday, June 6, 2011.

855. OFFSETTING DIFFERENT SIZED FUTURES POSITIONS

With the consent of the account controller, a clearing member may offset and liquidate long futures positions against short futures positions, or short futures positions against long futures positions, held in the same account in the following ratios:

E-mini Crude Oil (QM) to Crude Oil Financial (WS)	2:1
E-mini Natural Gas (QG) to	
Henry Hub Natural Gas Look-Alike Penultimate Financial (HP)	4:1
Henry Hub Natural Gas Last Day Financial (NN) to	
Henry Hub Natural Gas Look-Alike Last Day Financial (HH)	4:1
<u>Henry Hub Natural Gas Penultimate Financial (NP) to</u>	
<u> Henry Hub Natural Gas Look-Alike Penultimate Financial (HP)</u>	<u>4:1</u>
E-mini RBOB Gasoline (QU) to RBOB Gasoline Financial (RT)	2:1
E-mini Heating Oil (QH) to Heating Oil Financial (BH)	2:1

[The remainder of the Rule is unchanged.]

If you have any questions regarding the revisions, please contact Robert Sniagowski, Market Regulation, at 312.341.5991 or via email at Robert.Sniagowski@cmegroup.com. Alternatively, you may contact me at 312.930.8167 or via email at Sean.Downey@cmegroup.com. Please reference NYMEX Submission No. 11-213 in any related correspondence.

Sincerely,

/s/ Sean Downey
Associate Director & Assistant General Counsel