



December 26, 2013

VIA E-MAIL

Ms. Melissa Jurgens
Office of the Secretariat
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, N.W.
Washington, D.C. 20581

**Re: CFTC Regulation 40.2(a) Certification. Notification Regarding the Listing of Gasoline Euro-bob Oxy NWE Barges (Argus) Average Price Option and RBOB Gasoline Brent Crack Spread Average Price Option Contracts.
NYMEX Submission No. 13-545**

Dear Ms. Jurgens:

New York Mercantile Exchange, Inc. ("NYMEX" or "Exchange") is notifying the Commodity Futures Trading Commission ("CFTC" or "Commission") that it is self-certifying the listing of two (2) new petroleum crack spread options, 1) Gasoline Euro-bob Oxy NWE Barges (Argus) Crack Spread Average Price Option (Chapter 530; Code GCE) and 2) RBOB Gasoline Brent Crack Spread Average Price Option (Chapter 545; Code RBC), for CME Globex electronic trading, open outcry trading on the NYMEX trading floor and for submission for clearing through CME ClearPort beginning at 6:00 p.m. on Sunday, January 12, 2014 for trade date Monday, January 13, 2014.

The contract specifications are as follows:

Contract Name	Gasoline Euro-bob Oxy NWE Barges (Argus) Crack Spread Average Price Option	RBOB Gasoline Brent Crack Spread Average Price Option
Commodity Code	GCE	RBC
Underlying Futures	Gasoline Euro-bob Oxy NWE Barges (Argus) Crack Spread Futures (7K)	RBOB Gasoline Brent Crack Spread Futures (RBB)
Chapter	530	545
Exercise Type	European style; financially settled	European style; financially settled
Contract Size	1,000 barrels	1,000 barrels
Termination of Trading	Last business day of the contract month	Last business day of the contract month
Minimum Price Fluctuation	\$0.001 per barrel	\$0.001 per barrel
Value Per Tick	\$1.00	\$1.00
Strike Price	The strike price interval shall be \$0.25 per	The strike price interval shall be \$0.25

Listing	barrel	per barrel
Listing Convention	CME Globex, CME ClearPort and Open Outcry: 36 consecutive months	CME Globex, CME ClearPort and Open Outcry: 36 consecutive months

- **Trading Hours:**

Open Outcry: Monday – Friday 9:00 a.m. – 2:30 p.m. (8:00 a.m. – 1:30 p.m. Chicago Time/CT).
CME Globex and CME ClearPort: Sunday – Friday 6:00 p.m. – 5:15 p.m. (5:00 p.m. – 4:15 p.m. CT) with a 45-minute break each day beginning at 5:15 p.m. (4:15 p.m. CT).

- **Trading and Clearing Fees:**

Exchange Fees					
	Member Day	Member	Cross Division	Non-Member	HP
Pit	\$0.85	\$0.85	\$1.05	\$1.25	
Globex	\$0.85	\$0.85	\$1.05	\$1.25	\$1.05
ClearPort		\$0.85		\$1.25	

Other Processing Fees		
	Member	Non-Member
Cash Settlement	\$0.10	\$0.10
Facilitation Desk Fee	\$0.20	

The Exchange is also notifying the CFTC that it is self-certifying the insertion of the terms and conditions for the new option contract into the Position Limit, Position Accountability and Reportable Level Table and Header Notes located in the Interpretations and Special Notices Section of Chapter 5 of the NYMEX Rulebook in relation to the listing of the new contract. These terms and conditions establish the all month/any one month accountability levels, expiration month position limit, reportable level, diminishing balance and aggregation allocation for the new contracts.

NYMEX business staff responsible for the new products and the NYMEX legal department collectively reviewed the designated contract market core principles ("Core Principles") as set forth in the Commodity Exchange Act ("CEA"). During the review, NYMEX staff identified that the new products may have some bearing on the following Core Principles:

Compliance with Rules: Trading in the contracts will be subject to the rules in Rulebook Chapter 4 which includes prohibitions against fraudulent, noncompetitive, unfair and abusive practices. Additionally, trading in these futures contracts will also be subject to the full panoply of trade practice rules, the majority of which are contained in Chapter 5 and Chapter 8 of the Rulebook. As with all products listed for trading on one of CME Group's designated contract markets, activity in the new products will be subject to extensive monitoring and surveillance by CME Group's Market Regulation Department. The Market Regulation Department has the authority to exercise its investigatory and enforcement power where potential rule violations are identified.

Contracts Not Readily Susceptible to Manipulation: The new products are not readily subject to manipulation due to the deep liquidity and robustness in the underlying cash market, which provides diverse participation and sufficient spot transactions.

Prevention of Market Disruption: Trading in these contracts will be subject to the Rules of NYMEX which include prohibitions on manipulation, price distortion and disruptions of the delivery or cash-settlement process. As with all products listed for trading on one of CME Group's designated contract markets, activity in the new product will be subject to extensive monitoring and surveillance by CME Group's Market Regulation Department.

Position Limitations or Accountability: The spot-month speculative position limits for the contracts are set at less than the threshold of 25% of the deliverable supply in the respective underlying market.

Availability of General Information: The Exchange will publish information on the contracts' specifications on its website, together with daily trading volume, open interest, and price information.

Daily Publication of Trading Information: Trading volume, open interest, and price information will be published daily on the Exchange's website and via quote vendors.

Financial Integrity of Contracts: These contracts will be cleared by the CME Clearing House which is a registered derivatives clearing organization with the Commission and is subject to all Commission regulations related thereto.

Execution of Transactions: The new contracts will be listed for trading on CME Globex and the NYMEX trading floor and for clearing through the CME ClearPort platform. The CME ClearPort platform provides a competitive, open and efficient mechanism for novating transactions that are competitively executed by brokers. The CME Globex electronic trading platform provides for a competitive and open execution of transactions due to its advanced functionality, high reliability and global connectivity. Establishing non-reviewable trading ranges for Globex trades in the products facilitate price discovery in the products by encouraging narrow bid/ask spreads. In addition, the NYMEX trading floor continues to be available as a trading venue and provide for competitive and open execution of transactions.

Trade Information: All required trade information is included in the audit trail and is sufficient for the Market Regulation Department to monitor for market abuse.

Protection of Market Participants: Rulebook Chapters 4 and 5 contain multiple prohibitions precluding intermediaries from disadvantaging their customers. These rules apply to trading on all of the Exchange's competitive trading venues and will be applicable to transactions in the subject contracts.

Disciplinary Procedures: Chapter 4 of the Rulebook contains provisions that allow the Exchange to discipline, suspend or expel members or market participants that violate the Rulebook. Trading in the subject contracts will be subject to Chapter 4, and the Market Regulation Department has the authority to exercise its enforcement power in the event rule violations in this contract are identified.

Dispute Resolution: Disputes with respect to trading in the subject contracts will be subject to the arbitration provisions set forth in Chapter 6 of the Rulebook. Chapter 6 allows all nonmembers to submit a claim for financial losses resulting from transactions on the Exchange to arbitration. A member named as a respondent in a claim submitted by a nonmember is required to participate in the arbitration pursuant to Chapter 6. Additionally, the Exchange requires that members resolve all disputes concerning transactions on the Exchange via arbitration.

Pursuant to Section 5c(c) of the CEA and CFTC Regulations 40.2 and 40.6, the Exchange hereby certifies that the attached contracts comply with the Act, including regulations under the Act. A description of the cash market for these new products is attached.

The Exchange certifies that this submission has been concurrently posted on the Exchange's website at <http://www.cmegroup.com/market-regulation/rule-filings.html>.

Should you have any questions concerning the above, please contact the undersigned at (212) 299-2200 or Christopher.Bowen@cmegroup.com.

Sincerely,

/s/ Christopher Bowen
Managing Director and Chief Regulatory Counsel

Attachments: Appendix A: Rule Chapters
Appendix B: Position Limit, Position Accountability, and Reportable Level Table in Chapter 5 of the NYMEX Rulebook (attached under separate cover)
Appendix C: Rule 588.H – Globex Non-Reviewable Range Table
Appendix D: Cash Market Overview and Analysis of Deliverable Supply

APPENDIX A

Chapter 530

Gasoline Euro-bob Oxy NWE Barges (Argus) Crack Spread Average Price Option

530100. SCOPE OF CHAPTER

This chapter is limited in application to put and call options on Gasoline Euro-bob Oxy NWE Barges (Argus) Crack Spread futures contracts. In addition to the rules of this chapter, transactions in options on Gasoline Euro-bob Oxy NWE Barges (Argus) Crack Spread futures shall be subject to the general rules of the Exchange insofar as applicable.

530101. OPTION CHARACTERISTICS

The number of months open for trading at a given time shall be determined by the Exchange.

530101.A. Trading Schedule

The hours of trading for this contract shall be determined by the Exchange.

530101.B. Trading Unit

A Gasoline Euro-bob Oxy NWE Barges (Argus) Crack Spread Average Price Call Option traded on the Exchange represents the differential between the underlying spread and the strike price, multiplied by 1,000 barrels, or zero, whichever is greater. The underlying spread is equal to the arithmetic average of the mid-point between the high and low quotations from Argus Media Argus Media for Gasoline Euro-bob Oxy NWE Barges minus the Brent Crude Oil (ICE) Futures contract first nearby settlement price for each business day during the contract month (using Non-common pricing), except for (A) below. For purposes of determining the Floating Price, the gasoline assessment price will be converted each day to U.S. dollars and cents per barrel, rounded to the nearest cent. The conversion factor will be 8.33 barrels per metric ton. (A) The settlement prices of the 1st nearby contract month will be used except on the last day of trading for the expiring Brent Crude Oil Futures contract when the settlement prices of the 2nd nearby contract will be used. The underlying spread is also the final settlement price of the underlying Gasoline Euro-bob Oxy NWE Barges (Argus) Crack Spread futures. A Gasoline Euro-bob Oxy NWE Barges (Argus) Crack Spread Average Price Put Option traded on the Exchange represents the differential between the strike price and the underlying spread, multiplied by 1,000 metric tons, or zero, whichever is greater. The underlying spread is equal to the arithmetic average of the mid-point between the high and low quotations from Argus Media Argus Media for Gasoline Euro-bob Oxy NWE Barges minus the Brent Crude Oil (ICE) Futures contract first nearby settlement price for each business day during the contract month (using Non-common pricing), except for (A) below. For purposes of determining the Floating Price, the gasoline assessment price will be converted each day to U.S. dollars and cents per barrel, rounded to the nearest cent. The conversion factor will be 8.33 barrels per metric ton. (A) The settlement prices of the 1st nearby contract month will be used except on the last day of trading for the expiring Brent Crude Oil Futures contract when the settlement prices of the 2nd nearby contract will be used.

530101.C. Price Increments

Prices shall be quoted in dollars and cents per barrel and prices shall be in multiples of \$0.001 per barrel. The minimum price increment will be \$0.001.

530101.D. Position Limits and Position Accountability and Reportable Levels

The applicable position limits and/or accountability levels, in addition to the reportable levels, are set forth in the Position Limit, Position Accountability and Reportable Level Table in the Interpretations & Special Notices Section of Chapter 5.

A Person seeking an exemption from position limits for bona fide commercial purposes shall apply to the Market Regulation Department on forms provided by the Exchange, and the Market Regulation Department may grant qualified exemptions in its sole discretion.

Refer to Rule 559 for requirements concerning the aggregation of positions and allowable exemptions from the specified position limits.

530101.E. Termination of Trading

The option contract shall expire at the close of trading on the last business day of the contract month.

530101.F. Type Option

The option is a European-style option which can be exercised only on the expiration day.

530102. EXERCISE PRICES

(A) On the first business day of trading in an option contract month, trading shall be at the following strike prices: (i) the previous day's settlement price for Gasoline Euro-bob Oxy NWE Barges (Argus) Crack Spread futures contracts in the corresponding delivery month rounded off to the nearest twenty-five cent increment strike price unless such settlement price is precisely midway between two twenty-five cent increment strike prices in which case it shall be rounded off to the lower twenty-five cent increment strike price, and (ii) any strike price in increment of twenty-five cent is available via dynamic strike generation.

(B) Notwithstanding the provisions of subsections (A) of this rule, if the Exchange determines that trading in the option will be facilitated thereby, the Exchange may, by resolution, change the increments between strike prices, the number of strike prices which shall be traded on the first day in any new option contract month, the number of new strike prices which will be introduced on each business day or the period preceding the expiration of an option in which no new strike prices may be introduced.

530103.

DISCLAIMER

Argus Media ("Argus") licenses the New York Mercantile Exchange, Inc. ("NYMEX") to use various Argus price assessments in connection with the trading of the contract.

NEITHER NYMEX AND ITS AFFILIATES NOR ARGUS GUARANTEES THE ACCURACY AND/OR COMPLETENESS OF THE ASSESSMENT OR ANY OF THE DATA INCLUDED THEREIN.

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Chapter 545

RBOB Gasoline Brent Crack Spread Average Price Option

545100. SCOPE OF CHAPTER

This chapter is limited in application to put and call options on RBOB Gasoline Brent Crack Spread futures contracts. In addition to the rules of this chapter, transactions in options on RBOB Gasoline Brent Crack Spread futures shall be subject to the general rules of the Exchange insofar as applicable.

545101. OPTION CHARACTERISTICS

The number of months open for trading at a given time shall be determined by the Exchange.

545101.A. Trading Schedule

The hours of trading for this contract shall be determined by the Exchange.

545101.B. Trading Unit

A RBOB Gasoline Brent Crack Spread Average Price Call Option traded on the Exchange represents the differential between the underlying spread and the strike price, multiplied by 1,000 barrels, or zero, whichever is greater. The underlying spread is equal to the arithmetic average of the RBOB Gasoline futures contract first nearby settlement price minus the Brent Crude Oil (ICE) Futures contract first nearby settlement price for each business day during the contract month (using Non-common pricing), except for (A) below. For purposes of determining the Floating Price, the gasoline assessment price will be converted each day to U.S. dollars and cents per barrel, rounded to the nearest cent. (A) The settlement prices of the 1st nearby contract month will be used except on the last day of trading for the expiring Brent Crude Oil Futures contract when the settlement prices of the 2nd nearby contract will be used. The underlying spread is also the final settlement price of the underlying RBOB Gasoline Brent Crack Spread futures. A RBOB Gasoline Brent Crack Spread Average Price Put Option traded on the Exchange represents the differential between the strike price and the underlying spread, multiplied by 1,000 metric tons, or zero, whichever is greater. The underlying spread is equal to the arithmetic average of the RBOB Gasoline futures first nearby contract settlement price minus the Brent Crude Oil (ICE) Futures contract first nearby settlement price for each business day during the contract month (using Non-common pricing), except for (A) below. For purposes of determining the Floating Price, the gasoline assessment price will be converted each day to U.S. dollars and cents per barrel, rounded to the nearest cent. (A) The settlement prices of the 1st nearby contract month will be used except on the last day of trading for the expiring Brent Crude Oil Futures contract when the settlement prices of the 2nd nearby contract will be used.

545101.C. Price Increments

Prices shall be quoted in dollars and cents per barrel and prices shall be in multiples of \$0.001 per barrel. The minimum price increment will be \$0.001.

545101.D. Position Limits and Position Accountability and Reportable Levels

The applicable position limits and/or accountability levels, in addition to the reportable levels, are set forth in the Position Limit, Position Accountability and Reportable Level Table in the Interpretations & Special Notices Section of Chapter 5.

A Person seeking an exemption from position limits for bona fide commercial purposes shall apply to the Market Regulation Department on forms provided by the Exchange, and the Market Regulation Department may grant qualified exemptions in its sole discretion.

Refer to Rule 559 for requirements concerning the aggregation of positions and allowable exemptions from the specified position limits.

545101.E. Termination of Trading

The option contract shall expire at the close of trading on the last business day of the contract month.

545101.F. Type Option

The option is a European-style option which can be exercised only on the expiration day.

545102. EXERCISE PRICES

(A) On the first business day of trading in an option contract month, trading shall be at the following strike prices: (i) the previous day's settlement price for RBOB Gasoline Brent Crack Spread futures contracts in the corresponding delivery month rounded off to the nearest twenty-five cent increment strike price unless such settlement price is precisely midway between two twenty-five cent increment strike prices in which case it

shall be rounded off to the lower twenty-five cent increment strike price, and (ii) any strike price in increment of twenty-five cent is available via dynamic strike generation.

(B) Notwithstanding the provisions of subsections (A) of this rule, if the Exchange determines that trading in the option will be facilitated thereby, the Exchange may, by resolution, change the increments between strike prices, the number of strike prices which shall be traded on the first day in any new option contract month, the number of new strike prices which will be introduced on each business day or the period preceding the expiration of an option in which no new strike prices may be introduced.

545103.

DISCLAIMER

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APPENDIX B

Position Limit, Position Accountability, and Reportable Level Table in
Chapter 5 of the NYMEX Rulebook

(attached under separate cover)

APPENDIX C

Amendments to NYMEX Rule 588.H, Globex Non-Reviewable Trading Ranges (additions underlined)

Instrument	Bid/Ask Reasonability	Non-Reviewable Range (NRR)
<u>Gasoline Euro-bob Oxy NWE Barges</u> <u>(Argus) Crack Spread Average Price</u> <u>Option - GCE</u>	<u>The greater of the delta times the</u> <u>underlying futures non-reviewable range</u> <u>or 20% of the fair value premium up to</u> <u>the underlying futures non-reviewable</u> <u>range with a minimum reasonability of</u> <u>\$1.00</u>	<u>20% of premium up to 1/4 the underlying</u> <u>futures non-reviewable range with a</u> <u>minimum of 1 tick.</u>
<u>RBOB Gasoline Brent Crack Spread</u> <u>Average Price Option - RBC</u>	<u>The greater of the delta times the</u> <u>underlying futures non-reviewable range</u> <u>or 20% of the fair value premium up to</u> <u>the underlying futures non-reviewable</u> <u>range with a minimum reasonability of</u> <u>\$1.00</u>	<u>20% of premium up to 1/4 the underlying</u> <u>futures non-reviewable range with a</u> <u>minimum of 1 tick.</u>

APPENDIX D

Cash Market Overview and Analysis of Deliverable Supply

The Exchange is self-certifying the listing of financially settled Gasoline Euro-bob Oxy NWE Barges (Argus) Crack Spread Average Price Option and RBOB Gasoline Brent Crack Spread Average Price Option. The two option contracts are European style option and, upon expiration, will exercise against the underlying Gasoline Euro-bob Oxy NWE Barges (Argus) Crack Spread Futures and RBOB Gasoline Brent Crack Spread Futures respectively.

Price Sources: Argus

Argus

The price reporting services used for the final settlement of the new European gasoline contracts is Argus. Argus is one of the major pricing services that are used in the over-the-counter (OTC) market for pricing swap contracts, and the methodology utilized is well-known in the oil industry.

The Exchange has license agreements with Argus to utilize their pricing data. Argus has long-standing reputations in the industry in publishing price benchmarks that are fair and not manipulated. The pricing methodology for Argus is derived from telephone surveys and electronic data collected from multiple market participants to determine market value.

The Argus price assessment for the NWE barges Euro-bob oxy gasoline is in U.S. dollars and cents per metric ton. The pricing period is for loading 2-8 days forward. Size is standardized to 1,000-2,000t. The basis is fob Rotterdam/Amsterdam/Antwerp. Prices typically reflect a volume-weighted average of deals done within Argus criteria and published on the Argus Gasoline Bulletin Board

According to Argus methodology and specifications guide, the specifications for NWE barges Euro-bob oxy gasoline reflect grades of gasoline that meet EN228 specifications with a maximum of 10 ppm sulfur after they have been blended with 4.8pc ethanol of minimum 98.7pc purity. Oxygen content is limited to 0.9pc. The assessment time is 9.00 a.m. to 5.30 p.m. London time.

ICE

The Exchange does not have an information sharing agreement with the Intercontinental Exchange Inc. ("ICE"). The ICE Brent Crude Oil Futures contract is the source of the settlement price for RBOB Gasoline Brent Crack Spread Average Price Option.

The ICE Brent Crude Oil Futures is regulated by the U.K. Financial Services Authority ("FSA"). According to ICE, the average trading activity in the ICE Brent Crude Oil Futures contract represents more than 500,000 contracts traded per day. Since the CFTC has reviewed the FSA regulatory structure and determined it to be comparable to that of the CFTC, the Exchange is assured in placing confidence in the disseminated price for ICE Brent Crude Oil Futures contract.

European Gasoline Market

Starting at the end of 2009, premium unleaded gasoline was phased out across several countries in Northwest Europe and replaced by Euro-bob Gasoline which is blended component grade of Gasoline rather than a finished grade. The Mediterranean markets remained on premium unleaded Gasoline which is a finished grade of Gasoline.

The gasoline market in Northwest Europe (NWE) represents the largest hub in Europe for petroleum products, with extensive storage and refining capacity with approximately one million barrels per day (120,000 metric tons) supplied by refineries in Belgium, Netherlands, Germany and France. For France, we have taken 50% of the total numbers to reflect the fact that oil flows into the Mediterranean and the Northwest European markets. Monthly

production data, consumption data and imports and export data for the NWE region are presented in the following tables. The data is provided by the Joint Organizations Data Initiative Oil¹ ("JODI").

Refinery Production	2010	2011	2012	Average 2010-2012
Belgium	83	71	75	77
France	159	152	138	150
Germany	499	499	479	492
Netherland	174	153	164	164
Total	915	876	857	883

Demand	2010	2011	2012	Average 2010-2012
Belgium	31	27	29	29
France	93	91	83	89
Germany	455	454	29	312
Netherland	97	99	96	97
Total	676	671	235	527

Imports	2010	2011	2012	Average 2010-2012
Belgium	8	18	18	14
France	10	7	4	7
Germany	48	44	36	43
Netherland	218	242	276	245
Total	283	311	334	310

Exports	2010	2011	2012	Average 2010-2012
Belgium	61	64	65	63
France	67	60	54	60
Germany	113	110	115	113
Netherland	385	351	450	395
Total	626	584	684	631

Source: Joint Organizations Data Initiative (Units 000's b/d)

New York Harbor Gasoline Market

The RBOB Gasoline Futures Contract (commodity code: RB) is the main benchmark used for pricing of gasoline in the U.S. petroleum products market. The U.S. gasoline market represents a large physical market, with total U.S. refinery capacity of 9.0 million to 9.5 million barrels per day of gasoline.

In the U.S. gasoline market, there are two main formulations for gasoline: Reformulated gasoline and Conventional gasoline, as required by a complex network of Federal and State regulations. The U.S.

¹ The Joint Organizations Data Initiative Oil: <http://www.jodidb.org/TableViewer/tableView.aspx>

Environmental Protection Agency ("EPA") administers the Clean Air Act ("CAA") requirements, and various State agencies regulate their own specific air rules. Under the CAA, the urban areas with the highest levels of smog pollution are required to use clean-burning "Reformulated Gasoline" with 10% ethanol. These urban areas include the entire Northeastern United States, California, Chicago, Atlanta, and Houston. These areas account for approximately 40% of U.S. gasoline demand. Further, there is a 10% ethanol blending requirement in Reformulated Gasoline, and the ethanol must be segregated from the gasoline at the wholesale level in the pipeline distribution system. In the wholesale market, the gasoline is shipped unfinished except for the 10% addition of ethanol, and is called Reformulated Blendstock for Oxygen Blending (RBOB). The 10% ethanol blending occurs at the last stage of the delivery process when the gasoline is loaded into the tanker truck for retail delivery.

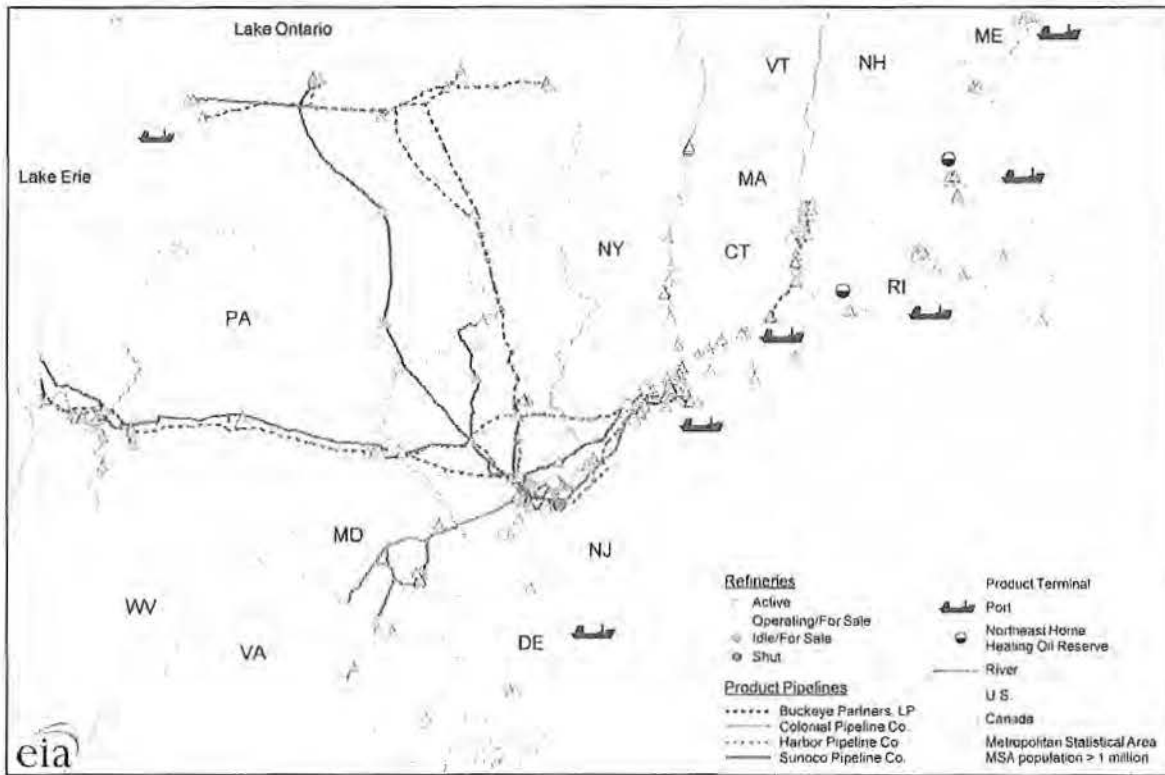
New York Harbor Delivery Region

New England and the Central Atlantic Coast of the United States, collectively defined by the US Energy Information Administration ("EIA") as the "Northeast", is a well-connected and integrated geographical region in terms of oil and products infrastructure. The region is part of the larger PADD 1 (Petroleum Administration Defense District), and more specifically defined by PADD 1a and PADD1b, which include: Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island, Vermont, Delaware, District of Columbia, Maryland, New Jersey, New York, and Pennsylvania².

Located in both New York and New Jersey, the New York Harbor area is the largest oil importing and third largest container port in the nation, and is the main oil and refined products pricing and trading hub. Petroleum products in New York Harbor are supplied by refineries located in New Jersey, Delaware and Pennsylvania, all located within 100 miles of the New York Harbor area. East Coast refineries, a majority of which are located in New Jersey and Philadelphia, send products by local pipelines into New York Harbor. The Colonial Pipeline connects the Northeast to refinery output from the US Gulf Coast and foreign imports, principally from Canada, Virgin Islands, Caribbean and Europe, are additional supply sources to the New York Harbor area.

² <http://www.eia.gov/analysis/petroleum/nerefining/prelim/>

Figure 1 - Northeast Refined Products Market Logistics³



The Colonial Pipeline is the largest refined products pipeline in the US and a key products supply link for the Northeast. The pipeline provides a link from the US Gulf Coast to the New York Harbor area through the south and across the Eastern seaboard. The Trainer, Marcus Hook and Philadelphia refineries are strategically located along the pipeline. According to the EIA, more than 500,000 b/d of gasoline and distillates are delivered into the Northeast via the Colonial pipeline, which terminates in Linden, NJ. It generally takes from 14 to 24 days for a product batch on the Colonial Pipeline to get from Houston, Texas to the New York Harbor, with 18.5 days the average time.

In 2010, Colonial Pipeline delivered nearly 850 million or 2.3 million b/d of refined products. In early 2011, Colonial expanded the northern end of its Houston-to-New York system, adding 100,000 b/d of capacity. In addition, the company completed a series of system upgrades leading to more than 100,000 b/d capacity for distillates⁴ specifically serving the New Jersey, Pennsylvania, and New York markets. In addition, Colonial Pipeline slated an additional 100,000 b/d of gasoline and distillates capacity to be available early 2013⁵ to meet demand in the Northeast.

Many of the petroleum products delivered to New York Harbor are redistributed to smaller ports where they supply local demand. In particular, the Hudson River, which meets the Atlantic Ocean in New York Harbor, provides a major inland water route for petroleum product barges supplying eastern New York and parts of western New England. Significant volumes are shipped to New England via barge from New York Harbor. On

³ Source: EIA, <http://www.eia.gov/analysis/petroleum/nerefining/update/pdf/neprodmkts.pdf>

⁴ http://www.eia.gov/pressroom/presentations/sieminski_10102012.pdf

⁵ http://www.colpipe.com/press_release/pr_114.asp

the other side of the State, western New York product markets are primarily supplied from Canada at the Port of Buffalo, and via the Buckeye and Sunoco pipeline systems from Pennsylvania and the Midwest⁶.

The majority of PADD 1 refineries are located in New Jersey, Delaware and Pennsylvania, and within 100 miles of the New York Harbor area. Further, these refineries are directly connected to the New York Harbor market by local pipelines and/or waterborne barges. A list of Northeast refineries is provided in Table I.

Table I - Northeast Refineries

Name	Location	Owner/Operator	Crude Distillation Capacity	Status
Delaware City Refinery	DE	PBF Energy	182,200 b/d	Operational
Port Reading	Port Reading, NJ	Hess	70,000 b/d. Processes straight run residual fuel oil.	Operational
Perth Amboy	Perth Amboy, NJ	Buckeye Partners	80,000 b/d, asphalt only.	Operational
Bayway Refinery	Linden, NJ	Phillips 66	238,000 b/d. Crude is supplied to the refinery by tanker, primarily from the North Sea, Canada and West Africa.	Operational
Paulsboro Asphalt	Paulsboro, NJ	Nustar Asphalt Refining	70,000 b/d. The refinery purchases heavy crude and produces asphalt only.	Operational
Paulsboro Refining	Paulsboro, NJ	PBF	160,000 b/d	Operational
Bradford	Bradford, PA	American Refining Group	10,000 b/d	Operational
Trainer	Trainer, PA	Monroe Energy (Delta Subsidiary)	185,000 b/d	Resumed operations in Q4-2012.
Marcus Hook	Marcus Hook, PA	Sunoco/Energy Transfer Partners	178,000 b/d. Processes light sweet oil from Nigeria, some Bakken.	Idle
Philadelphia	Philadelphia, PA	Sunoco/Energy Transfer Partners and Carlyle Group	330,000 b/d	Operational
Warren	Warren, PA	United Refining Co.	70,000 b/d	Operational

⁶ <http://205.254.135.7/state/state-energy-profiles-analysis.cfm?sid=NY>

Concerns on the availability supply of refined products on the US East Coast early in 2012 as a result of potential and existing refinery closures eased considerably in subsequent months. According to the EIA, reflecting both an improved outlook for regional refining activity and success in meeting logistical challenges⁷. Delta Airline's 185,000 b/d Trainer Refinery restarted operations late 2012 after being idle during the majority of the year⁸. The refinery represents 16% of East Coast refining capacity. Other developments, including increased product flows into the region from the Midwest (PADD 2) that were identified as a possible outcome by the EIA and an increased capacity to bring waterborne products into the product pipelines originating in the Philadelphia area, have also contributed to the easing of product supply concerns. Notably, the ability to bring in products to pipelines that feed Pennsylvania and western New York has increased as a result of Sunoco Logistics' Eagle Point Terminal in New Jersey becoming operational. With a connection to the Colonial Pipeline as well as dock capacity to bring in waterborne petroleum products and move them on the pipelines running westward, Eagle Point helps to create a more flexible infrastructure in the region.

Methodology: Key Components of Deliverable Supply

In estimating deliverable supply for the RBOB Gasoline Futures contract, we relied on production and supply levels that could reasonably be considered readily available for delivery. There are three key components that the Exchange took into account when updating the deliverable supply estimates of the RBOB Gasoline Futures contract:

- A. *Refinery and Blender Production;*
- B. *Pipeline flows and net receipts to the delivery area;*
- C. *Storage levels in the delivery area.*

The main source of data for the cash market analysis is the US Energy Information Administration (EIA) which provides detailed data on the key components of deliverable supply. The EIA provides data on a weekly, monthly, and annual basis.

I. Refinery and Blender Production

In recent years, Northeast refineries supplied about 40% of gasoline (and 60% of the ULSD) consumed in the Northeast. Net receipts from the Gulf Coast and imports supply the remainder of the market⁹. The EIA provides gasoline production data for RBOB that is produced by both refiners and blenders, under the category of "refiner and blender net production." The majority of PADD 1 refineries are located in New Jersey, Delaware and Pennsylvania, with direct connection to the New York Harbor market by pipelines and/or waterborne barges. In addition, the "refiner and blender" category includes RBOB produced by blenders that use imported gasoline blending components.

Blenders are significant producers of RBOB gasoline, and a vast amount of RBOB blending components are sourced through imported gasoline blendstocks that enter via the New York Harbor. Generally gasoline blenders are large trading companies that operate in the global market, such as Vitol, Morgan Stanley, JP Morgan, Glencore, Cargill, Koch, Trafigura, and Northville. Given that the blenders' production of RBOB is sourced from imported gasoline blending components, these imported components are imbedded in the category of "blender" production. Therefore, given that imported gasoline blending components are included in the "blender" production category, the Exchange will include only the EIA's "Refiner and Blender Net Production" category as the key component of New York Harbor supply (and not *add* imports).

⁷ <http://www.eia.gov/oog/info/twip/twiparch/120725/twipprint.html>

⁸ http://www.eia.gov/pressroom/presentations/sieminski_10102012.pdf

⁹ http://www.eia.gov/pressroom/testimonies/howard_03192012.pdf

According to EIA data from 2010-2012, and as presented in Table II below, the three-year average of RBOB production by refiners and blenders in PADD 1 was 1.2 million barrels per day, or 36 million barrels per month. The RBOB gasoline that is produced in PADD 1 is in the vicinity of New York Harbor, and the majority of this RBOB is transshipped and/or stored in NYH terminals. According to input from market participants, approximately 30% to 40% of RBOB production is committed to retail distribution networks, and the remaining portion is available for re-selling in the spot market. Therefore, at least 60% of PADD 1 production of RBOB would be available for re-selling in the NYH spot market. Consequently, we estimate that approximately 21 million barrels of RBOB would be deliverable in New York Harbor.

Table II – EIA Statistics: PADD 1 Production and Net Imports

RBOB Gasoline, in thousand b/d	2010	2011	2012	Average
Refinery and Blender Net Production ¹⁰	1,230	1,190	1,180	1,200
Imports of RBOB Gasoline Blending Components ¹¹	195	174	135	164
Exports	0	0	0	0

The majority of gasoline imports into PADD 1 arrive in the New York Harbor area, the largest oil import hub in the US. According to industry sources, approximately 50% of PADD 1 imports occur in the New York Harbor area. According to EIA data from June-2010 (earliest available) through February-2013, average imports of RBOB blending components into PADD 1 was approximately 164,000 b/d. It is worth emphasizing that blenders have the flexibility to produce RBOB gasoline using either imported blending components or other gasoline blending components. However as previously mentioned, to prevent potential double-counting of imported blending components with domestic as reported by the EIA, the Exchange will not use imports in its deliverable supply analysis.

II. Pipeline Flows and Net Receipts

The US Gulf Coast, or PADD 3, refining capacity accounts for 50% of total US production of refined products, and provides approximately 273,000 b/d of RBOB gasoline to PADD 1 (See Table III below) via pipeline and water. However, the majority of PADD 1 pipeline receipts of RBOB from PADD 3 do not end up in the New York Harbor area as they are delivered at points further south of NYH in the Washington, DC metropolitan area. According to market participants, only about 25% to 30% of PADD 1 gasoline pipeline receipts are delivered to the New York Harbor area at Linden, NJ. Therefore, using the 25% estimate for RBOB pipeline shipments from PADD 3, the pipeline supply to NYH accounts for approximately 67,650 barrels per day, or about 2 million barrels per month.

Table III – RBOB Movements into PADD 1¹²

Year	Average of Monthly data in b/d		
	From PADD 2	From PADD 3	Total

¹⁰ EIA, http://www.eia.gov/dnav/pet/pet_pnp_wprodrb_dcu_r10_w.htm

¹¹ EIA, http://www.eia.gov/dnav/pet/pet_move_wkly_dc_R10-Z00_mbbldpd_w.htm

¹² EIA, Data is converted to barrels per day, http://www.eia.gov/dnav/pet/pet_move_ptb_dc_R10-R30_mbbld_a.htm

2010	3,407	278,600	280,019
2011	3,638	265,986	268,411
2012	4,438	267,182	270,409
Average	3,828	270,589	272,946

III. Inventories of Gasoline in the New York Harbor Market

New York Harbor has a petroleum bulk terminal storage capacity of over 75 million barrels, making it the largest petroleum product hub in the country. The three-year average of gasoline stocks held in the Central Atlantic, or PADD1b, region is approximately 27 million barrels (See Table IV below). According to market participants, the New York Harbor RBOB market accounts for 25% to 30% of the inventories reported in EIA's PADD 1b inventory statistics. Using a conservative estimate of 25% of PADD 1b inventories, the average stock level of all gasoline is estimated to be about 7 million barrels in New York Harbor. While the EIA does not report RBOB blending component stocks data for PADD 1b specifically, weekly statistics are provided for PADD 1. Accordingly, stocks of RBOB blending components in PADD 1 averaged at approximately 17 million barrels in 2010-2013¹³.

Table IV – Gasoline Stocks in PADD 1b, average thousands of barrels¹⁴

2010	26,161
2011	29,303
2012	26,150
Average	27,205

Based on estimates from industry experts, we determined that the operational minimum levels for storage tanks in the New York Harbor area are approximately 10%. Therefore, we estimate that approximately 1 million barrels of the 7 million barrels of stored gasoline in NYH is used for operations, leaving 6 million barrels available for spot month delivery from inventory.

Summary of Deliverable Supply

The key components NYMEX considered in updating deliverable supply are refinery and blender production, pipeline flows from the US Gulf Coast, and storage levels in the delivery area. The Exchange estimates the monthly deliverable supply of RBOB gasoline to the New York Harbor to be approximately 29 million barrels, which is equivalent to 29,000 contracts per month. Given the CFTC spot month position limit guideline of not exceeding 25% of the available monthly supply, the deliverable supply of RBOB Gasoline to New York Harbor would support a spot month position limit of up to 7,250 contract equivalents. The current spot month position limit for the New York Harbor RBOB Gasoline Futures Contract (RB) contract is 1,000 contracts, which represents approximately 3.4% of the available monthly supply of RBOB Gasoline.

The following are the three components that comprise the deliverable supply estimate of 29 million barrels per month:

¹³ http://www.eia.gov/dnav/pet/hist/LeafHandler.ashx?n=pet&s=m_epobgrr_sae_r10_mbbf&f=m

¹⁴ <http://www.eia.gov/dnav/pet/hist/LeafHandler.ashx?n=pet&s=mgtst1b1&f=a>

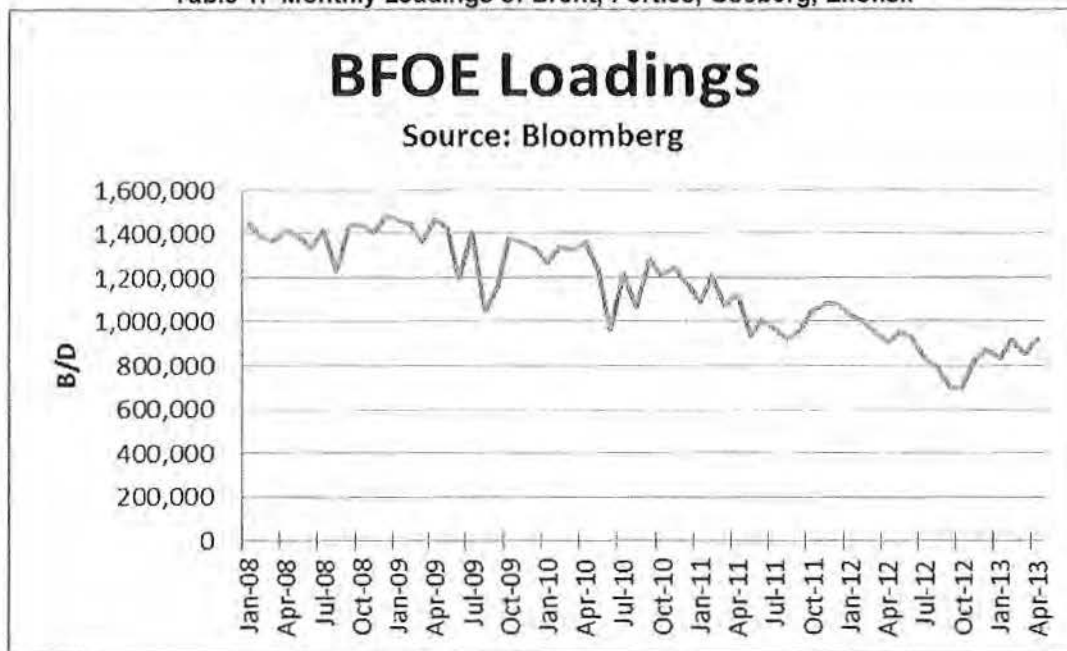
- A. Refinery and Blender Production = 21 million barrels
- C. Pipeline flows to the delivery area = 2 million barrels
- D. Storage levels in the delivery area = 6 million barrels

Brent Market

The Brent market is comprised of four North Sea crude oil grades: Brent, Forties, Oseberg, and Ekofisk ("BFOE" or "Brent"). The standard cargo size in the BFOE market is 600,000 barrels. These four North Sea grades are segregated blends delivered at different locations in the North Sea, and each can be substituted by the seller in the 25-Day BFOE cash market. The four BFOE fields lie in the North Sea. Brent and Forties are in UK sector, whilst Ekofisk and Oseberg are in Norwegian sector.

Bloomberg LP ("Bloomberg") provides details of the BFOE loading programs for the four grades that comprise the Brent market. According to data published by Bloomberg¹⁵, daily crude oil production for these four grades has been declining over the past few years, as shown in Table 1. Based on the most recent 3-year average of the Bloomberg data on BFOE loadings (from August through July 2013), the total loadings of Brent (BFOE) crude oil was approximately 970,825 barrels per day, which is equivalent to approximately 29 million barrels per month or 29,000 contract equivalents (contract size: 1,000 barrels). In the last 12 months (from August 2012 to July 2013), the average loadings of Brent (BFOE) crude oil have declined to 821,000 barrels per day, which is equivalent to 24.6 million barrels per month, or 24,600 contract equivalents.

Table 1: Monthly Loadings of Brent, Forties, Oseberg, Ekofisk



¹⁵ See various news reports at www.bloomberg.com, for example <http://www.bloomberg.com/news/2011-08-10/north-sea-ekofisk-crude-oil-loadings-at-14-cargoes-in-september.html>, although consolidated loading data requires a subscription to access.

Bloomberg BFOE Loadings		
Year	Month	B/D
2013	Jan	832,258
	Feb	921,429
	Mar	870,986
	Apr	880,000
	May	893,548
	Jun	720,000
	Jul	851,613
	2013 Avg	852,831
2012	Jan	1,030,645
	Feb	1,003,448
	Mar	951,613
	Apr	906,667
	May	956,452
	Jun	926,667
	Jul	832,258
	Aug	793,548
	Sep	700,000
	Oct	696,774
	Nov	819,667
	Dec	872,581
2012 Avg	874,193	
2011	Jan	1,095,161
	Feb	1,201,786
	Mar	1,074,194
	Apr	1,125,000
	May	938,710
	Jun	1,003,333
	Jul	969,355
	Aug	922,581
	Sep	965,000
	Oct	1,048,387
	Nov	1,081,667
	Dec	1,082,258
2011 Avg	1,042,286	
2010	Jan	1,272,581
	Feb	1,341,071
	Mar	1,325,258
	Apr	1,361,667
	May	1,235,484
	Jun	964,900
	Jul	1,214,516
	Aug	1,066,032
	Sep	1,283,667
	Oct	1,216,452
	Nov	1,246,667
	Dec	1,169,356
2010 Avg	1,224,804	
3-Year Avg	2010-2012	1,100,001

The U.S. Department of Energy's Energy Information Administration ("EIA") publishes data for crude oil production at a country level. The country level below encompass more than the four BFOE fields. However, they are indicative of the amount of oil production from the region that is traded with reference to the Dated Brent price benchmark. Production data is shown below in Table 2.

Table 2: Crude Oil Production (thousand barrels per day)

	2007	2008	2009	2010	2011	2012
Norway	2,564.9	2,463.5	2,352.6	2,134.6	2,007.4	1,902.1
UK	88.9	85.1	87.4	87.1	82.7	85.4
UK (Offshore)	1,601.8	1,502.9	1,422.1	1,318.7	1,084.1	913.7

Source: Energy Information Administration¹⁶

Market Participants

Brent crude oil has active over-the-counter ("OTC") physical and paper markets. The liquidity in the cash and OTC swaps market is robust. The OTC market participation is deep and diverse, and includes both cash market and OTC market players. The Brent cash and OTC market participants include many commercial companies, refiners, end users, brokers and financial institutions with over fifty (50) participants.

Physical Market Trading Structure

The Brent physical market is comprised of two main components: 1) the "Dated" Brent market for cargo transactions in the spot market for delivery in the next of 10 to 25 days; and 2) the forward market, for cargo transactions for delivery in the timeframe beyond 25 days, i.e., the forward month 25-day Brent cash market.

The core of the Brent market is the forward cash market. The Brent forward market consists of the trading of cargoes of any of the Brent, Forties, Osberg or Ekofisk streams, for delivery beyond 25 days with no specific date assigned for loading. The cargoes are 600,000 barrels and, in the forward market, the precise loading date is not provided, only the delivery month—i.e., August BFOE Cargo. However, the commercial contracts, which are standardized, underlying the forward market specify the minimum timing the Seller must provide the Buyer to notify them as to the specific cargo loading date—currently 25 days in advance. After the Seller of a BFOE forward cargo notifies the Buyer as to the loading date and which stream is being loaded, the contract now is considered to move from the forward-market to the Dated-Market; historically, this moment has been referred as the cargo "going wet". Dated cargoes (or wet cargoes) are distinguished from forward cargoes simply because the loading dates (and the stream) are known. Dated cargoes are also traded in the cash market, and those transactions are reported by price reporting agencies.

The Brent cash market is essentially a reseller market where buyers either: resell the oil to someone else; transport the cargo and resell it later; or transport the cargo to consume it. Most of the sales in the Brent market are conducted as spot-market transactions; in fact, Brent cargoes in the physical market are estimated to trade 10 or more times. Typically, there is a chronology of sales and purchases of crude oil in the Brent cash market that starts with a sale from the equity producer in a spot market transaction, and finishes with a purchase by an end-user to consume the crude oil. Equity producers typically utilize the robust spot market to sell their BFOE production at the cargo loading terminal, as a "Free on Board" (FOB) delivery. Traders play an active role in the Brent market as middlemen with the expressed responsibility of reselling the oil. Further, the refiners typically rely on the spot market to purchase Brent crude oil, because there is vibrant liquidity in the spot market, and hence, the refiners have developed a preference for short-term spot market purchases, rather than long-term contracts.

¹⁶ See:

<http://www.eia.gov/cfapps/ipdbproject/iedindex3.cfm?tid=5&pid=53&aid=1&cid=r3,&syid=2008&eyid=2012&unit=T BPD>

This applies to refiners affiliated with equity producers as well as those not affiliated; this is the standard practice, established and institutionalized over the past 34 years.

The Exchange has spoken with a number of market participants regarding common commercial practices with respect to the use of spot versus term contracts in the Brent crude oil market.³ The responses we received were consistent and they can be summarized as follows:

- The majority of BFOE production is sold on a spot market or short-term basis, rather than on a long-term basis; as discussed in the previous section, equity producers typically utilize the robust spot market to sell their BFOE production, while refiners prefer to purchase in the spot market, because there is vibrant liquidity in the cash market.
- There are no restrictions applied to the resale of BFOE cargoes bought in the cash market. In fact, traders play an important role as middleman with the responsibility of reselling the oil. Hence, given the robust liquidity in the Brent cash market, market participants have preferred to transact their commercial contracts in the spot market, rather than via long-term contracts.
- There is one refinery located in Grangemouth, UK that is connected directly via pipeline to the Forties loading terminal. This refinery, which runs 210,000 barrels per day, was formerly owned by BP, and is currently owned by Petrolneos, a 50:50 joint venture between PetroChina and INEOS. According to market participants, the Grangemouth refinery sources crude oil directly via the Forties pipeline, as well as from imported cargoes. The refinery does not publicly disclose its crude oil purchases, but the market sources with whom the Exchange consulted indicated that BFOE barrels refined there are typically sourced via the spot-market. Notwithstanding that practice, in the interest of erring on the side of underestimating deliverable supply, the Exchange is assuming that approximately 50% of its crude oil are delivered directly from the Forties crude oil stream—bypassing the spot market—, and the deliverable supply of Forties crude oil is being reduced accordingly. Therefore, we assume that the deliverable supply of Forties is reduced by 105,000 barrels per day, which is equivalent to 3.2 million barrels per month.

ANALYSIS OF DELIVERABLE SUPPLY

The proposed new option contracts are spread contracts, which means the contract is priced as a differential between two individual outright legs. The underlying index of these three legs are: 1) Euro-bob Oxy NWE Barges (Argus), 2) RBOB Gasoline Futures and 3) Brent Crude Oil Futures (ICE). Consequently, we propose that the position limits for the new option and futures contract to be aggregated into the four existing "parent" outright futures on the above indexes as follow:

Contract Name	Leg 1	Leg 2
Gasoline Euro-bob Oxy NWE Barges (Argus) Crack Spread Average Price Option	Gasoline Euro-bob Oxy NWE Barges (Argus) Futures	Brent Crude Oil Penultimate Financial Futures
RBOB Gasoline Brent Crack Spread Average Price Option	RBOB Gasoline Last Day Financial Futures	Brent Crude Oil Penultimate Financial Futures

Euro-bob Gasoline

The Northwest European gasoline market is priced in units of dollars per metric ton. The conversion factor is 8.3 barrels per metric ton.

The JODI data has been used as the basis for this analysis since it has a comprehensive breakdown of the data available. For northwest Europe, the countries included in this analysis are Belgium, the Netherlands, Germany and France. For France, we have taken 50% of the total numbers to reflect the fact that oil flows into the Mediterranean and the Northwest European markets. We have used the three year annualized averages for the period 2010 to 2012 as we believe that this is the most representative data set available. This is also consistent with other analyses we have provided for the European market. In Northwest Europe according to the JODI data, total Gasoline production for the three-year averages to 2012 across Belgium, France, Germany and the Netherlands was 883,000 barrels per day or 106,002 metric tons per day (3,180,060 metric tons per month). Consequently the current spot month limit of 500 contracts (equivalent to 4.15 million barrels) is approximately 15.7% of the monthly deliverable supply of gasoline in the Northwest Europe (NWE) market (based on a contract size of 1,000 metric tons).

RBOB Gasoline

The Exchange's estimate of RBOB gasoline deliverable supply to the New York Harbor delivery area is based on refinery and blender production, pipeline flows and storage levels.

The Exchange estimates the monthly deliverable supply of RBOB gasoline to the New York Harbor (NYH) to be approximately 29 million barrels, which is equivalent to 29,000 contracts per month. Given the CFTC spot month position limit guideline of not exceeding 25% of the available monthly supply, the deliverable supply of NYMEX New York Harbor ULSD Heating Oil would support a spot month position limit of up to 7,250 contract equivalents. The current spot month position limit for the NYMEX New York Harbor RBOB Gasoline Futures Contract is 1,000 contracts. The current spot month position limit represents 3.4% of the monthly deliverable supply.

Brent

In its analysis of deliverable supply, the Exchange concentrated on the actual loadings of Brent-related (BFOE) crude oil. In addition, the Exchange has reduced the deliverable supply of Forties to account for the crude oil purchases by the Grangemouth refinery.

Based on the most recent 3-year average of the Bloomberg data on BFOE loadings (from August 2011 through July 2013), the total loadings of Brent (BFOE) crude oil was approximately 970,825 barrels per day, which is equivalent to approximately 29 million barrels per month, or 29,000 contract equivalents (contract size: 1,000 barrels). Further, to account for the crude oil purchases by the Grangemouth refinery, the deliverable supply would be reduced by 3.2 million barrels per month. Therefore, the total deliverable supply of BFOE is approximately 25.8 million barrels per month, which is equivalent to 25,800 contracts. To be conservative, the Exchange proposes to amend the current spot month position limit from 2,000 to 4,000 contracts, which is equivalent to 4 million barrels and is approximately 15.5% of the 25,800 contract equivalents of monthly supply.

Contract Name	Rule Chapter	Commodity Code	Contract Size	Contract Units	Type	Settlement	Group
Gasoline Euro-bob Oxy NWE Barges (Argus) Crack Spread Average Price Option	530	GCE	1,000	Barrels	Eu.Option	Financially Settled Option	Refined Products
RBOB Gasoline Brent Crack Spread Average Price Option	545	RBC	1,000	Barrels	Eu.Option	Financially Settled Option	Refined Products

Diminishing Balance Contract	Reporting Level	Spot-Month position comprised of futures and deliveries	Spot-Month	Spot-Month	Spot-Month Aggregate Into Ratio Leg (1)	Spot-Month	Spot-Month Accountability Level	Initial Spot- Month Limit (In Net Futures Equivalents) Leg (1) / Leg (2)
			Aggregate Into Futures Equivalent Leg (1)	Aggregate Into Futures Equivalent Leg (2)		Aggregate Into Ratio Leg (2)		
Y	25		7H	BB	8.33 GCE : 1 7H	1 GCE : -1 BB		500/ 4,000
Y	25		27	BB	1 RBC : 1 27	1 RBC : -1 BB		1,000/ 4,000

Spot-Month

Initial Spot-Month Limit Effective Date

For 7H: Close of trading 3 business days prior to last trading day of the contract and for BB: Close of trading 3 business days prior to last trading day of the contract

For 27: Close of trading 3 business days prior to last trading day of the contract and for BB: Close of trading 3 business days prior to last trading day of the contract

	Single Month						All Month				
	Single Month Aggregate Into Futures Equivalent Leg (1)	Single Month Aggregate Into Futures Equivalent Leg (2)	Single Month Aggregate Into Ratio Leg (1)	Single Month Aggregate Into Ratio Leg (2)	Single Month Accountability Level Leg (1) / Leg (2)	Single Month Limit (In Net Futures Equivalents) Leg (1) / Leg (2)	All Month Aggregate Into Futures Equivalent Leg (1)	All Month Aggregate Into Futures Equivalent Leg (2)	All Month Aggregate Into Ratio Leg (1)	All Month Aggregate Into Ratio Leg (2)	All Month Accountability Level Leg (1) / Leg (2)
Spot-Month Limit (In Contract Units) Leg (1) / Leg (2)											
500,000/4,000,000	7H	BB	8.33 GCE : 1 7H	1 GCE : -1 BB	2,500/ 10,000		7H	BB	8.33 GCE : 1 7H	1 GCE : -1 BB	3,500/20,000
42,000,000/ 4,000,000	27	BB	1 RBC : 1 27	1 RBC : -1 BB	5,000/ 10,000		27	BB	1 RBC : 1 27	1 RBC : -1 BB	7,000/20,000

All Month Limit (In Net Futures Equivalents) Leg (1) / Leg (2)