



Via Portal Submission

February 14, 2022
MGEX Submission No. 22-9

Mr. Christopher Kirkpatrick
Secretary of the Commission
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street NW
Washington, DC 20581

RE: Rule Certification Submission Pursuant to Regulation 40.6(a); Amendment to MGEX Rules

Dear Mr. Kirkpatrick:

Pursuant to Commodity Exchange Act (“CEAct”) Section 5c and Commodity Futures Trading Commission (“CFTC” or “Commission”) Regulation 40.6(a), the Minneapolis Grain Exchange, LLC (“MGEX” or “Exchange”) hereby certifies that the addition of MGEX Rule 23.11.1. regarding block trades on Bitnomial Exchange, LLC (“Bitnomial”) as set forth in Exhibit A comply with the CEAct and the Commission regulations promulgated thereunder (the “Proposed Amendments”). MGEX further certifies that the submission and pending changes to the MGEX Rules have been posted on the Exchange website at the following link: <http://www.mgex.com/regulation.html>.

Overview of Rule Amendment

Pursuant to an agreement between the parties, MGEX provides clearing services for derivative contracts traded on Bitnomial. Bitnomial intends to make block trades available for its Bitcoin and Deci Bitcoin US Dollar futures contracts in the near future, and the Proposed Amendments will govern block trades made on Bitnomial.

DCO Core Principles

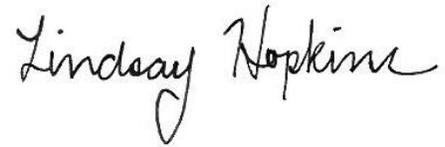
In connection with the Proposed Amendments, the Exchange has reviewed the core principles for DCOs (“DCO Core Principles”) and has determined that the amendment complies with the requirements of such principles. During the review, MGEX identified the following DCO Core Principle as potentially being impacted:

- *DCO Core Principle L – Public Information:* Core Principle L requires DCOs to provide market participants with sufficient information and to have clear, comprehensive rules and procedures. The amendments will be incorporated into MGEX’s publicly available Rulebook, thus ensuring that the information available to the public is accurate, clear, and comprehensive.

Pursuant to MGEX Bylaw 3.1., the MGEX Board of Directors unanimously approved the attached Proposed Amendments at its meeting held February 3, 2022. There were no substantive opposing views expressed by the Board, nor is the Exchange aware of any substantive opposing views with respect to this filing. The attached Proposed Amendments are to be effective when incorporated into the MGEX Rulebook posted on

its website, which will be at least 10 business days following the date of this submission. If there are any questions regarding this submission, please contact me at (612) 321-7143 or lhopkins@mgex.com. Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink that reads "Lindsay Hopkins". The signature is written in a cursive style with a large initial "L" and "H".

Lindsay Hopkins
Chief Corporate Counsel, MGEX Clearing

MINNEAPOLIS GRAIN EXCHANGE, LLC

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EXHIBIT A

The following MGEX Rules are to be amended. Additions are underlined while deletions are **marked through**.

23.11.1. BLOCK TRADES.

Block trades will be permitted in the Bitnomial Exchange Contracts designated by Bitnomial Exchange, provided such trades meet the minimum quantity thresholds and all applicable Bitnomial Exchange rules and CFTC Regulations. All block trades must be submitted via the Bitnomial Exchange match engine and in accordance with the deadlines set forth by Bitnomial Exchange (and in no case later than 4:15 p.m. Central Time). In order to execute a block trade on the match engine, Clearing Members and/or Market Participants must have access to the Bitnomial Exchange and receive all required permissions and approvals prior to executing block trades via Bitnomial Exchange. Upon verification by Bitnomial Exchange, block trades will be submitted to MGEX for clearing.

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