

The impact of water conservation regulations on mining firms: a stochastic control approach

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Abstract

Large water demands by the mining industry are of increasing concern around the world. The cost of a specific water management regulation is studied for an oil sands mining operation in Canada, where restrictions on water withdrawals vary with fluctuations in the river. A stochastic optimal control problem is formulated for a firm choosing production, water use, and the timing to build a water storage facility, under conditions of uncertain oil prices and uncertain water withdrawal limits. As no closed form solution is available, a stochastic dynamic programming approach is implemented to determine the difference in value and optimal controls for the oil-producing asset, with and without water restrictions. The cost of the restrictions is estimated to be quite small given historical river flow conditions, while cost is shown to increase under drier conditions. A long run marginal cost curve is developed showing the cost of increasing restrictions given expectations about future river conditions and oil prices.

Keywords: oil sands, water conservation, storage, optimal control, HJB equation, semi-Lagrangian, stochastic dynamic programming

JEL codes: Q30, Q40, C61, C63

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1 Introduction

1 The management of scarce water supplies is an issue of increasing concern in many areas of
2 the world and is exacerbated by uncertainty surrounding the impacts of a warming planet on
3 water availability. The resource extraction industry is responsible for large withdrawals of
4 water, and competition for water supplies may put industry operations into conflict with local
5 communities. These conflicts arise when water demands for resource extraction encroach on
6 the water supplies available for other human activities or compromise aquatic ecosystems.
7 Protection of the public interest requires that governments around the world specify limits
8 on water withdrawals and enforce legal and regulatory requirements regarding water access
9 rights.

10 Media and industry reports make it clear that competition for water supplies is of increas-
11 ing concern for firms involved in resource extraction. Water availability has been reported
12 as being one of the biggest problems facing mining firms today.¹ Similar concerns have been
13 raised regarding shale gas development.² Regulatory responses vary across jurisdictions, de-
14 pending on the state of water supplies, the nature of other competing uses, as well as the
15 existing political, legal and regulatory frameworks. Thomashausen et al. (2018) review the
16 legal framework regulating water use for gold and copper mining in eight different countries.
17 All countries surveyed required mining firms to obtain water licenses or permits as well as
18 undertake some sort of environmental assessment. The basis for allocating water shares
19 varies, and is typically some combination of riparian or prior appropriation rights, as well as
20 rules about the transfer or trading of water rights.

21 In theory, a social planner would impose the efficient limits on water withdrawals which
22 balance the benefit of maintaining particular water levels in a water source with the cost
23 of those restrictions to current and anticipated future water users. In practice, regulators
24 charged with restricting water withdrawals to protect surrounding ecosystems face a diffi-

¹See for example a July 27 2014 Financial Times article “Water scarcity and rising energy costs threaten mining industry”; a Moody’s Investor Service report “Global Mining Industry: Water scarcity could increase rating pressure on global mining companies”, February 14, 2013; and Toledano & Roorda (2014).

²See discussions in Vengosh et al. (2014) and Holding et al. (2017).

25 cult balancing act, especially if proposed water regulations are viewed as a threat by existing
26 water users. Determining the benefits and costs of water limitations can be problematic, par-
27 ticularly when the impact of large water withdrawals on ecosystems are not well understood
28 and require additional scientific study. The impact of water restrictions on large industrial
29 water users depends on the future path of key variables including the impacts of a changing
30 climate on water availability, prospects for water conserving technologies, and the market
31 demand for the industry's output. Failure to understand the costs of water regulations to
32 large water users increases the likelihood that water restrictions will be set at an inappro-
33 priate level and may represent a missed opportunity to improve ecosystem protection at a
34 low cost. Alternatively, a determination that restrictions are very costly to firms points to
35 the need for a process to respond appropriately to ameliorate those costs.

36 In this paper we argue that considerable insight into the costs of water restrictions can
37 be gained by modelling a firm's decision making as a stochastic optimal control problem.
38 This approach allows for the explicit modelling of key uncertain variables and the different
39 options facing the firm in choosing its responses. Our study undertakes a systematic analysis
40 of the cost of water regulations imposed on a particular resource extraction activity - mining
41 of the oil sands in Alberta, Canada. This case is of interest as it manifests several important
42 features commonly arising in cases of industrial water regulation. In particular, the severity
43 of imposed regulations varies with a particular environmental indicator which will change
44 over time in response to changing weather and climate conditions. Second, profitability
45 of the industry, and hence the cost of restrictions, depends on volatile market conditions.
46 Third, firms can reduce the cost of regulations by making capital investments, such as in
47 water storage facilities.

48 The specific contribution of this paper is to demonstrate a rigorous approach, using
49 stochastic dynamic programming, to examining the cost of environmental regulations for a
50 firm. This amounts to use of a provably convergent numerical technique,³ which illuminates
51 the impact of regulations on the profit maximizing decisions of a typical oil sands firm.

³The numerical convergence of this stochastic dynamic approach to a meaningful solution is described in Forsyth & Labahn (2007) for finance applications.

52 Innovative features of the model include uncertain regulatory limits on water withdrawals and
53 the option to invest in water storage technology. Water demands by the firm are determined
54 by optimal decisions about oil production, given available oil reserves and the terms of a
55 license agreement with the government. Oil production, and hence water use, is affected
56 by volatile oil prices determined in world markets. A numerical example is presented based
57 on available data for oil sands production technology and costs, with oil prices described
58 by a stochastic differential equation and water restrictions modelled as a Poisson process.
59 The model allows us to examine several important phenomena including the marginal cost
60 of stricter water regulations, the impact of regulations on optimal decisions such as when
61 to install storage and when to abandon the project, and the impact of uncertain oil prices
62 and water levels on a firm's behaviour. To the best of our knowledge no previous literature
63 examines the cost of restrictions in this rigorous fashion.

64 This paper contributes to the literature on optimal natural resource use under uncertainty
65 as exemplified by papers such as Pindyck (1980), Brennan & Schwartz (1985), Mason (2001),
66 Slade (2001), Chen & Insley (2012), and Insley (2017). Similar to Chen & Insley (2012) and
67 Insley (2017), the firm's decision problem is specified by a Hamilton-Jacobi-Bellman (HJB)
68 equation which is solved using a numerical method, as there is no closed form solution. The
69 paper extends the analysis in previous papers by including an uncertain regulatory constraint
70 resulting from natural variability in the environment. It also contributes to the environmental
71 economics literature addressing water issues specifically. A paper with a similar motivation
72 is Mannix et al. (2014) which examines the efficiency of Alberta's water regulations for the
73 oil sands using a deterministic model. Their focus is the efficiency of the protocol for water
74 sharing among firms.

75 As a preview, some key highlights of the paper are summarized below.

- 76 • A long run marginal cost curve is derived showing the impact of tightening water
77 restrictions. The shape of the curve is non-monotonic due to the lumpy (discrete)
78 nature of storage investments.
- 79 • Alberta's regulations on water withdrawals from the Lower Athabasca River (Alberta

80 and Canada 2007) impose only a very small cost on the hypothetical oil sands firm
81 analyzed in this paper. Costs to the firm only become significant when future river
82 conditions are drier than in the past decade and regulations are stricter. This finding
83 implies that current regulations could be made stricter at a relatively low cost.

- 84 • Oil price volatility affects the decision to invest in water storage facilities in an inter-
85 esting way, depending on the extent to which water limitations are binding. When
86 water withdrawals are highly restricted, an increase in price volatility makes the in-
87 vestment in storage more likely (i.e. the critical oil price for investment is reduced).
88 In contrast, when water restrictions are not binding an increase in oil price volatility
89 makes it optimal to delay investment in water storage.

90 The rest of this paper is structured as follows. Section 2 provides background information
91 related to the oil sands industry and Alberta’s water use regulations. Sections 3 and 4 develop
92 a model for the stochastic optimal control problem. Section 5 describes the determination
93 of parameter values in the model. Section 6 elaborates on the results. Section 7 summarizes
94 the conclusions.

95 2 Regulation of water use in the Alberta oil sands

96 Open pit oil sands mining depends heavily on fresh water as an input, in contrast to in-situ
97 projects which are able to use both saline and fresh water.⁴ The large ramping up in the
98 scale of oil sands activity in the early 2000s brought public attention to the quantity of
99 both surface and groundwater withdrawals, as well as many other environmental impacts
100 that have been well documented in the literature.⁵ Moreover, in the early to mid-2000s,
101 forecasts pointed to ongoing increases in oil sands production, which resulted in significant
102 concerns being expressed about the impacts of water withdrawals on the aquatic ecosystem
103 (National Energy Board 2006, Griffiths & Woynillowicz 2003, Jensen 2010, Toman et al.

⁴Kuwayama et al. (2013) provide an overview of water resource used for the extraction of unconventional fossil fuels. Up to date data is available from the Alberta Energy Regulator.

⁵See Griffiths et al. (2006), Gosselin et al. (2010), Squires et al. (2010), and Bruce (2006) for details.

104 2008, Woynillowicz et al. 2005, Peters et al. 2013, Mannix et al. 2010, Ivanhoe Energy Inc.
105 2012). Combined with the conclusions drawn by some scholars (Wolfe et al. 2012, Schindler
106 & Donahue 2006, Squires et al. 2010, Wolfe et al. 2008, Bawden et al. 2014, Rasouli et al.
107 2013, Peters et al. 2013) that there is a declining trend of the river flow in the Athabasca
108 catchment, public alarm about impacts on the aquatic ecosystem was unsurprising.

109 According to Lunn et al. (2013), in the Lower Athabasca River, the collective withdrawals
110 constitute only a tiny percentage of the river flow (less than 0.6% of average total river
111 flows and about 3% of the lowest weekly winter flows). However, since the river flows vary
112 significantly between seasons while oil sands production has less seasonal variation, in water
113 short seasons, there are risks that the withdrawals will exceed the sustainable level and
114 damage aquatic habitat. Note there is considerable scientific uncertainty over how much
115 water can be safely diverted from the river without harming the aquatic ecosystem.⁶ In
116 addition, the river sustains the livelihood and culture of First Nations and Metis communities
117 in the area, and low flow hinders navigation on the river. The Peace-Athabasca Delta is a
118 landscape of great ecological significance, located within one of Canada's 15 UNESCO World
119 Heritage Sites. Its ecosystem is heavily dependent on the river flow level of the Athabasca
120 River (Wolfe et al. 2012).

121 In response to these concerns, the Alberta government drafted a river management plan
122 for the Lower Athabasca River to limit withdrawals according to river conditions. The
123 management plan was first imposed in 2007 and is described in the Phase 1 Framework
124 (Alberta and Canada 2007). This Phase 1 Framework was intended to address immediate
125 needs for water protection based on available evidence in 2007, with the intention that the
126 regulations would be revised in future based on the results of further research. Additional
127 research and consultation with stakeholders were carried out over the subsequent seven years,
128 resulting in a revision to the water regulations released in 2015 as the Phase 2 Framework

⁶See for example a CTV news report from March 19 2014, "Alberta's plan for Athabasca River 'pathetic,' not science-based: critics." by Bob Weber, The Canadian Press. This article quotes David Schindler, a University of Alberta ecologist who claims a lack of scientific evidence for the chosen water restrictions and argues that even a couple of inches less in the river can have a critical impact on fish habitat, bug populations, water quality, ground water etc.

129 (Alberta 2015). The Phase 2 regulations imposed a somewhat finer classification of water
130 flow conditions, but are otherwise similar to the Phase 1 regulations. For simplicity, in this
131 paper we demonstrate the determination of the economic cost of this regulation, using the
132 details of the Phase 1 specification.

133 The stated objective of the Alberta Framework is to “manage cumulative water with-
134 draws to support both human and ecosystem needs, while balancing social, environmental,
135 and economic interests” (Alberta 2015, p. 3). The Framework specifies aggregate permitted
136 water withdrawals by oil sands mining firms depending on river conditions. When river
137 flows are below certain specified thresholds, cutbacks in water diversions are required. In
138 the Phase 1 Framework, river conditions are categorized as being in one of red, yellow or
139 green zones which signifies low, medium, and abundant water flows, respectively. In the
140 green zone, up to 15% of instantaneous flow is allowed to be cumulatively withdrawn by all
141 five oil sands firms, i.e. Canadian Natural Resources, Imperial, Shell, Suncor, and Syncrude,
142 which operated in the Lower Athabasca River Region during the years from 2007 to 2015.
143 In the yellow zone, the maximum amount of water allowed to be withdrawn is 10% of the
144 average of HDA80 ⁷ and Q95⁸. In the red zone, a maximum 5.2% of the historical median
145 flow in each week can be withdrawn. Figure 1 depicts average, minimum and maximum
146 river flows in the Athabasca River since 1957 compared to the three zones set by the Phase
147 1 Framework. It also shows the frequency with which river flows would be classified in the
148 green, yellow or red zones over that 60 year period. It will be observed that the river did
149 fall into the yellow or red zones with a significant frequency over this period.

150 Alberta’s water management Framework is layered upon an existing prior appropriation
151 regime, or “First in Time, First in Right” (FITFIR), whereby senior license holders are given
152 priority over more junior water license holders.⁹ However with the implementation of the
153 Framework, oil sands firms were asked to develop water sharing rules to be implemented in

⁷HDA80 is the river flow level corresponding to a habitat area level that is equalled or exceeded 80% of the time.

⁸Q95 is the flow level that is equalled or exceeded 95% of the time.

⁹Before 1999, licenses to withdraw water were issued without expiry dates according to the Water Resources Act. Since the Water Act took effect in 1999, new water licenses have a fixed time of validity (usually ten years).

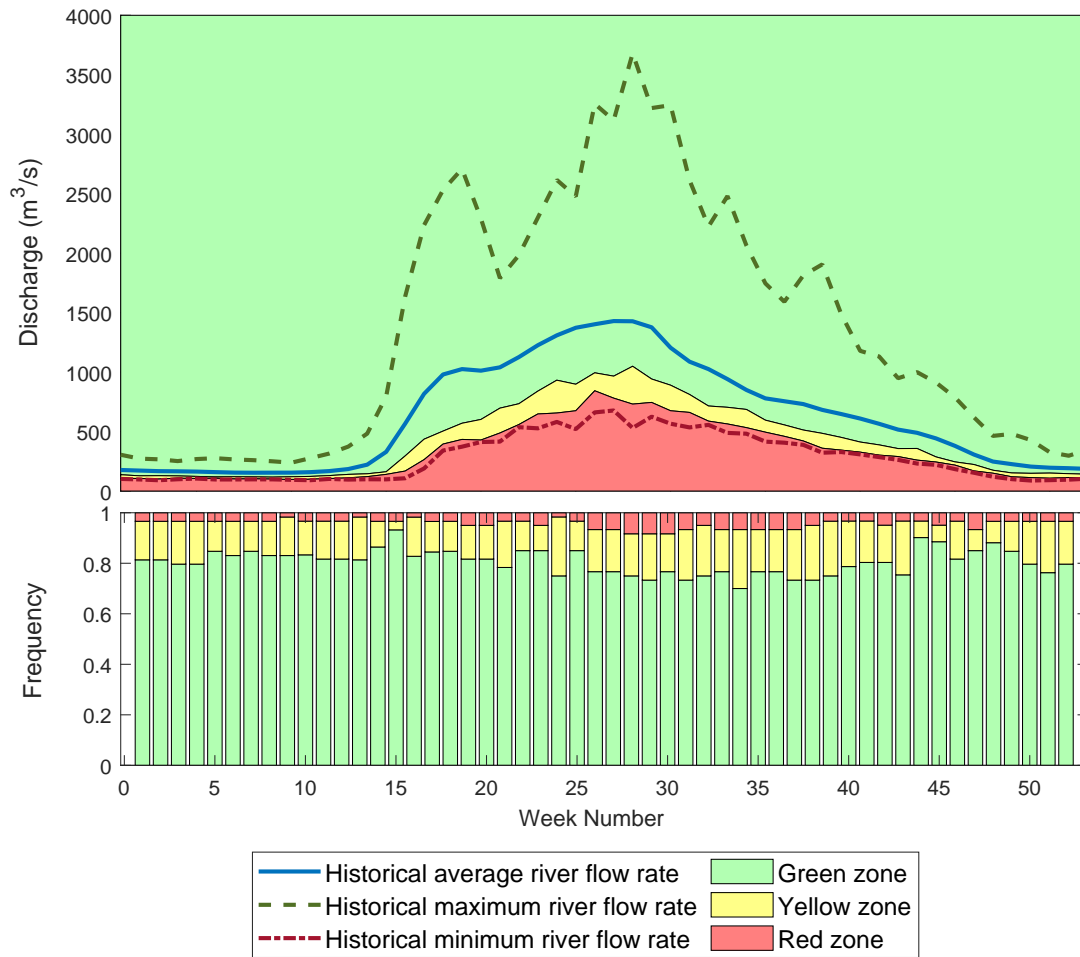


Figure 1: River Flows at the Athabasca River Gauge below Fort McMurray Station 07DA001 Compared to the Three Zones Set by Alberta's 2007 Water Management Framework (The data are recorded from October 1, 1957 to December 31, 2017)

154 the red or yellow zones, rather than following the rules of FITFIR (Adamowicz et al. 2010).
 155 The details of the agreed to water sharing rules in the event of water shortfalls are submitted
 156 annually to the government. The 2008-2009 agreement gave priority to those firms holding
 157 older licenses (Adamowicz et al. 2010). Subsequent agreements, at least since 2012, specify
 158 more equal sharing of the reductions in allowed water usage. For example, the agreement for
 159 the 2014-2015 winter period allocated the restricted water quantity during the yellow and red
 160 zones almost equally among the five oil sands extraction operators active at that time.¹⁰ It
 161 stipulates that when the amount withdrawn by any individual operator exceeds the assigned
 162 allotment, the operator should report this to the relevant Alberta government department.
 163 However, there is no punishment specified for exceeding the agreed to allotment.

164 River flows are highly seasonal and the Phase 1 Framework encourages firms to store
 165 water during times of high water availability for use during times of shortfall. Imperial Oil’s
 166 Kearn Lake project was the first to invest in water storage in order to eliminate the need
 167 to withdraw water from the river during low flow seasons.¹¹ Constructing an on-site pond
 168 is one feasible choice.¹² Operators require permission from the AER if there are changes
 169 to exploration or operation locations, which includes construction of on-site water storage
 170 facilities.¹³

171 3 Model description

172 We analyze the case of a hypothetical oil sands firm in the Lower Athabasca River region.
 173 We assume the operation is large enough that a single water storage pond will serve only
 174 one operation. The decision model is based on the one developed in Insley (2017), however,

¹⁰In 2015 there were five firms operating open pit oil sands mining operations, Canadian Natural Resources Ltd., Imperial Oil Ltd., Shell Albian Sands, Suncor Energy Inc. and Syncrude Canada Ltd. See the Oil Sands Water Management Agreement for the 2014-2015 Winter Period. <http://osip.alberta.ca/library/Dataset/Details/562>(accessed on January 11, 2020).

¹¹See page 19 of Imperial Oils 2012 Summary Annual Report

¹²See an on-line article from Suncor Energy “Athabasca River water use: 5 things you need to know.” <http://osqar.suncor.com/2014/07/athabasca-river-water-use-5-things-you-need-to-know.html>(accessed on January 11, 2020.)

¹³According to the Alberta Energy Regulator’s Oil Sands and Coal Exploration Application Guide. <https://www.aer.ca/documents/manuals/Manual008.pdf>(accessed on January 11, 2020).

175 the current model includes the constraint on water withdrawals which follows a Poisson
 176 process, includes water inventory as an additional state variable, and includes the decision
 177 to construct storage as an optimal control.

178 3.1 Oil production and water usage

179 We assume that the firm is already producing bitumen from its oil sands development and
 180 that there is a fixed oil to water ratio. Accordingly, we assume a linear production function:

$$Q(W_p(t), t) = \eta W_p(t) \quad \eta > 0, W_p(t) \geq 0, 0 \leq Q(W_p(t), t) \leq \bar{q} \quad (1)$$

181 where Q is output, η is a constant indicating the number of barrels of bitumen that can be
 182 produced using one barrel of fresh water, $W_p(t)$ is the water used in production at time t ,
 183 and \bar{q} is a fixed upper limit on the rate of production.

184 With no water management regulations, the firm can produce up to its full capacity by
 185 using water without any restriction. In the presence of the Framework, in the absence of
 186 water storage capacity, the firm has to cut back production during the yellow and red zones,
 187 in which case profits will be impaired. The firm has the option to install a water storage
 188 facility. The inventory of water in storage, I , will be augmented by water withdrawals from
 189 the river, W_w and reduced by W_p as water is drawn out of storage for use in oil production.
 190 The change in water inventory is given by the following differential equation:

$$dI = (W_w(t) - W_p(t))dt \quad (2)$$

191 The level of the water inventory in storage is constrained to be a positive number which
 192 is less than the storage capacity I^{\max} . t_0 refers to time zero, or the starting time for the
 193 analysis.

$$I(t) = I(t_0) + \int_{t_0}^t (W_w(t') - W_p(t')) dt' \geq 0, \quad I(t_0) = \iota_0, \quad 0 \leq I(t) \leq I^{\max} \quad (3)$$

3.2 Water withdrawals from the river

According to the Framework, a weekly constraint on fresh water withdrawals is set for the oil sands industry and the restricted cumulative withdrawal in the yellow and red conditions is allocated among five oil sands firms roughly evenly. The rate of water withdrawal, W_w , is restricted to be no greater than \bar{W} where $\bar{W} \in \{\bar{W}_1, \bar{W}_2, \bar{W}_3\}$. The subscripts $k = 1, 2, 3$, represent the river flow condition or water zone where $k = 1$ is the green zone, $k = 2$ is the yellow zone, and $k = 3$ is the red zone. It is assumed that the change of water constraint from the current zone k to another u can be described by a stochastic differential equation.

$$d\bar{W} = \sum_{u=1}^3 (\bar{W}_u(t) - \bar{W}_k(t)) \times dX_{k \rightarrow u} \quad k = 1, 2, 3 \quad (4)$$

where $dX_{k \rightarrow u}$ is a Poisson Process:

$$dX_{k \rightarrow u} = \begin{cases} 1 & \text{with probability } (\lambda^{k \rightarrow u} dt), \\ 0 & \text{with probability } (1 - \lambda^{k \rightarrow u} dt). \end{cases} \quad k = 1, 2, 3; u = 1, 2, 3 \quad (5)$$

The Poisson process is intended to reflect the natural variability in river flows. We assume that the risk of uncertain water flows is not correlated with the economy and the stock market. Therefore, it is a diversifiable risk and the real or \mathcal{P} measure can be used to model dX .¹⁴

3.3 Oil resource stock

Production depletes the resource stock S :

$$dS = -Q(W_p(t), t)dt, \quad S(t_0) = s_0 \quad (6)$$

given

$$\int_{t_0}^T Q(W_p(t), t)dt \leq S(t_0) \quad (7)$$

¹⁴See Geman (2009) for an introductory discussion of the real or \mathcal{P} measure versus the risk neutral or \mathcal{Q} . Björk (2009) provides an advanced treatment.

212 where $S(t_0)$ is the level of available oil reserves at t_0 , t_0 is starting time, and T is the lease
 213 end date.

214 3.4 Project stages

215 To investigate the investment behaviour of this firm, five project stages are considered. In
 216 stage 1, there is no water storage facility, and the firm holds the option to suspend production
 217 (stage 2) or to move on to stage 3, in which the water storage facility is installed and put
 218 into use. With the presence of the water storage facility, the firm can choose to stay in
 219 stage 3, or suspend the production temporarily (stage 4). The final stage, stage 5, is the
 220 permanent abandonment of the project. When in stages 1 to 4, the firm can decide to
 221 abandon (switching to stage 5) by paying an abandonment cost. Let δ_m be the notation for
 222 each stage, where m stands for the sequence number of stages and $m = 1, \dots, M$. In this
 223 study $M = 5$. Stages are summarized in the following table:

Stage, δ	Description
1	Producing oil, no storage
2	Suspended, no storage
3	Producing oil, storage installed
4	Suspended, storage installed
5	Permanently abandoned

225 3.5 Oil prices

226 There is a substantial existing literature examining alternative models for stochastic resource
 227 prices. Seminal papers include Brennan (1991), Gibson & Schwartz (1990), Schwartz (1997),
 228 and Schwartz & Smith (2000). The best model choice depends on the context in which it
 229 will be used. For this paper we desire a parsimonious model that provides a reasonable
 230 depiction of the behaviour of oil prices, but does not involve additional stochastic factors
 231 which unnecessarily complicate the solution of the HJB equation. Huang (2020) provides

232 a detailed examination of several alternative models of oil price dynamics. For this paper
 233 the analysis is undertaken using a simple log mean-reverting model. The assumed stochastic
 234 differential equation describing oil prices under the \mathcal{Q} -measure (i.e. the risk neutral measure)
 235 is given as follows:

$$dP = \epsilon(\mu - \ln P(t))P(t)dt + \sigma P(t)dz \quad (8)$$

236 where $P(t)$ is the crude oil spot price at time t (in \$U.S.), μ is the long run mean log price
 237 that $\ln P(t)$ tends to, ϵ is the speed of the mean reversion, σ is the volatility, and dz is the
 238 increment of a Wiener process. $\epsilon(\mu - \ln P(t))P(t)$ and $\sigma P(t)$ are called the drift term and
 239 the volatility term respectively. dz and $dX_{k \rightarrow u}$ (defined in Equation (5)) are assumed to be
 240 independent of each other.

241 3.6 Cash flows

242 Annual cash flows are derived from revenue from the production and sale of oil reserves less
 243 fixed, variable costs and taxes. Both revenues and costs depend on the stage of operation,
 244 whether the project is operating, temporarily suspended or permanently abandoned. At
 245 time t , the realized profits will be

$$\begin{aligned} \pi (P(t), S(t), \bar{W}(t), I(t), \delta(t)) = & \\ & \overbrace{\left[P(t) \cdot \rho - (c_{ve}^o + c_{vne}^o) \cdot \mathbb{1}_{\{\delta=1,3\}} \right] \cdot \eta \cdot W_p (P(t), S(t), \bar{W}(t), I(t), \delta(t))}^{\text{oil sales revenue}} \quad (9) \\ & \underbrace{-c_f^o \cdot \mathbb{1}_{\{\delta=1,3\}} - c_s \cdot \mathbb{1}_{\{\delta=1,2,3,4\}}}_{\text{oil production costs}} \underbrace{- [c_f^s + c_v^s(I)] \cdot \mathbb{1}_{\{\delta=3,4\}}}_{\text{water storage costs}} \underbrace{- \Lambda(P(t), \delta(t)) \cdot \mathbb{1}_{\{\delta=1,2,3,4\}}}_{\text{taxes}} \end{aligned}$$

246 where $\mathbb{1}_{\delta=\delta_m}$ is the indicator function which equals one if $\delta = \delta_m$ and zero otherwise, ρ is the
 247 discount of bitumen prices against WTI prices and Λ is the sum of all applicable taxes. The
 248 c 's denote various fixed and variable costs for oil production and water storage, and are listed
 249 in Table 2. Total taxes include three elements: $\Lambda(\cdot) = \text{Carbon tax} + \text{Royalty} + \text{Income tax}$,
 250 calculated as shown in Table 1.

251 In addition to annual cash flows, there are one time costs incurred to move from one

Table 1: Taxes

Carbon tax =	Carbon tax rate (\$/tonne) \times Carbon emissions (tonnes/bbl) \times Oil Production
Royalty =	Royalty Rate (\$/barrel) \times Oil Production
Income tax =	$\max\{0, \text{Income tax rate} \times (\text{Oil Sales Revenue} - \text{Oil Production Costs} - \text{Water Storage Costs} - \text{Royalty} - \text{Carbon tax})\}$

Table 2: Project costs

	Stage 1	Stage 2	Stage 3	Stage 4	Stage 5
Annual costs					
Fixed operating cost c_f^o	✓		✓		
Sustaining capital cost c_s	✓	✓	✓	✓	
Energy variable operating cost c_{ve}^o	✓		✓		
Non-energy variable operating cost c_{vne}^o	✓		✓		
Fixed cost of water storage c_f^s			✓	✓	
Variable cost of water storage $c_v^s(I)$			✓	✓	
One time costs					
Construction cost of water storage C			✓		
Mothball cost C_m		✓		✓	
Reactivating cost C_{re}	✓		✓		
Abandonment costs C_r					✓

252 stage to another. To go from an operating stage without storage to one with storage, the
 253 cost of constructing storage facilities must be incurred, which we denote as C . To switch
 254 from an operating stage to a suspended stage, the mothball cost, C_m is incurred. To move
 255 back from a suspended stage to an operating stage, the reactivating cost, C_{re} is incurred.
 256 Similarly, to move from any stage to permanent abandonment, an abandonment cost, C_r is
 257 incurred. We also assume that it is not possible to move from a stage with water storage
 258 back to a stage without water storage or move from permanent abandonment back to any
 259 other stage. This is implemented by setting the costs to these relevant stage switches as a
 260 very large number C_{large} . Table 2 summarizes the costs incurred in or between stages.

261 4 Specification of the Decision Problem

262 The firm's objective is to maximize the expected present value of cash flows from its oil
 263 sands operation over T years. There are three control variables: water withdrawals (W_w)
 264 from the river, oil production Q (which determines the water used in production, W_p), and
 265 the decision to switch project stages which we denote (δ^+). Control variables depend on five
 266 state variables: the oil price (P), the resource stock (S), the water withdrawal limit (\bar{W}),
 267 the water inventory in storage (I), and the project stage (δ).

268 4.1 Admissible sets for control variables

269 Admissible sets are now specified for the control variables. Let Z_{δ^+} denote the admissible
 270 set for δ^+ where

$$Z_{\delta^+} = \{\delta_1, \delta_2, \delta_3, \delta_4, \delta_5\}. \quad (10)$$

The admissible set for oil production, Q , depends on the resource stock, water storage inventory, project stage, and water withdrawals from the river. Denote this admissible set as $Z_Q(S, I, \delta, W_w)$, which is given as follows:

$$Q \in Z_Q(S, I, \delta, W_w) \quad (11a)$$

$$Z_Q = \left[0, \min \left[S, \bar{q}, \eta W_w \right] \right], \quad \text{if } S > 0, \delta = \delta_1. \quad (11b)$$

$$Z_Q = \left[0, \min \left[S, \bar{q}, \eta(W_w + I) \right] \right], \quad \text{if } S > 0, \delta = \delta_3. \quad (11c)$$

$$Z_Q = 0, \quad \text{if } S = 0, \delta = \delta_m, m = 1, 3. \quad (11d)$$

$$Z_Q = 0, \quad \text{if } \delta = \delta_m, m = 2, 4, 5, \forall S. \quad (11e)$$

271 Equation (11b) states that in stage δ_1 , oil production is constrained by the stock of oil
 272 reserves, the maximum oil production limit, and the amount of water withdrawn from the
 273 river multiplied by the water productivity coefficient. In stage 3, described in Equation (11c),

274 water from the existing storage inventory is added to water withdrawals from the river as a
 275 constraint on water available for oil production.

Define an admissible set for water withdrawals, W_w , denoted $Z_W(\bar{W}, \delta)$, as follows:

$$\begin{aligned}
 W_w &\in Z_W(\bar{W}, \delta) & (12) \\
 Z_W &= [0, \bar{W}_1], \quad \text{if } \bar{W} = \bar{W}_1, \delta = \delta_1, \delta_3 \\
 Z_W &= [0, \bar{W}_2], \quad \text{if } \bar{W} = \bar{W}_2, \delta = \delta_1, \delta_3 \\
 Z_W &= [0, \bar{W}_3], \quad \text{if } \bar{W} = \bar{W}_3, \delta = \delta_1, \delta_3 \\
 Z_W &= 0, \quad \text{if } \delta = \delta_2, \delta_4, \delta_5
 \end{aligned}$$

276 4.2 Optimal controls and value function

277 It is assumed that at predetermined, fixed times, the firm makes a decision about whether
 278 to change to a different project stage. These fixed times are denoted by \mathcal{T}_d :

$$\mathcal{T}_d \equiv \{t_0 = 0 < t_1 < \dots < t_m < \dots, t_M < T\} \quad (13)$$

279 The firm can switch stages instantaneously at $t \in \mathcal{T}_d$, and may incur a switching cost in
 280 doing so. At time T , the project must be terminated and clean up costs are incurred. In the
 281 numerical example in this paper, the time between fixed decisions dates is set as one week.

282 Choices regarding the rate of water withdrawal, W_w , and oil production, Q , are made in
 283 continuous time in time intervals given as follows:

$$\mathcal{T}_c \equiv \{(t_0, t_1), \dots, (t_{m-1}, t_m), \dots, (t_M, T)\}. \quad (14)$$

Controls are specified as functions of state variables as follows:

$$\begin{aligned}
 &Q^+(P, S, \bar{W}, I, \delta, t), \quad W_w^+(P, S, \bar{W}, I, \delta, t), \quad t \in \mathcal{T}_c \\
 &\delta^+(P, S, \bar{W}, I, \delta, t), \quad t \in \mathcal{T}_d.
 \end{aligned}$$

284 Let K denote the set of particular choices for the controls for all t_m .

$$K = \{(\delta^+)_{t \in \mathcal{T}_d} ; (Q^+, W_w^+)_{t \in \mathcal{T}_c}\} \quad (15)$$

285 For any particular K , the value function $V(p, s, \bar{w}, \iota, \bar{\delta}, t)$, can be written as the expected
 286 discounted value of the integral of future cash flows with the expectation taken over the
 287 controls, given the state variables, where $p, s, \bar{w}, \iota, \bar{\delta}$ denote particular realizations of the
 288 state variables P, S, \bar{W}, I , and δ .

$$V(p, s, \bar{w}, \iota, \bar{\delta}, t) = \mathbb{E}_K \left[\int_{t'=t}^{t'=T} e^{-rt'} \pi(P(t'), S(t'), \bar{W}(t'), I(t'), \delta(t')) dt' \right. \\ \left. + e^{-r(T-t)} V(P(T), S(T), \bar{W}(T), I(T), \delta(T), T) \mid P(t) = p, S(t) = s, \bar{W}(t) = \bar{w}, I(t) = \iota, \delta(t) = \bar{\delta} \right]. \quad (16)$$

289 r is the real risk free discount rate, and $\mathbb{E}[\cdot]$ is the expectation operator. Note that the
 290 expectation is taken under the risk neutral or \mathcal{Q} measure. In our numerical example the
 291 value in the final time period, $V(P(T), S(T), \bar{W}(T), I(T), \delta(T), T)$, is assumed to be the cost
 292 of clean up if the project had not been abandoned before T ($\delta = \delta_m, m = 1, 2, 3, 4$), or is
 293 equal to zero if the firm has already abandoned the project ($\delta = \delta_5$).

294 Equation (16) is solved for the optimal controls contained in the admissible sets (Equa-
 295 tions (10), (11), and (12) and subject to Equations for $dS, d\bar{W}, dI$, and dP ((6), (4), (2),
 296 and (8)). A dynamic programming algorithm is implemented solving backwards in time and
 297 proceeding in two phases: (1) the decision to switch stages made at fixed time points, t_m ,
 298 and (2) the choice of water withdrawals and oil production made in continuous time in the
 299 interval $t \in (t_m^+, t_{m+1}^-)$, where t_m^+ denotes the instant after t_m and t_{m+1}^- denotes the instant
 300 before time t_{m+1} .

301 4.3 Solution at Fixed Decision Dates

302 At any $t_m \in \mathcal{T}_d$, the firm chooses the optimal stage, t_m^+ , at which the project value minus
 303 any switching cost is at a maximum, other things equal.

$$\delta^+(p, s, \bar{w}, \iota, \bar{\delta}, t_m) = \arg \max_{\delta} (V(p, s, \bar{w}, \iota, \delta, t_m) - C_{\bar{\delta} \rightarrow \delta}) \quad (17)$$

304 where $C_{\bar{\delta} \rightarrow \delta}$ denotes the cost for switching from stage $\bar{\delta}$ at time t_m to stage δ at time t_m^+ .
 305 Table 3 specifies $C_{\bar{\delta} \rightarrow \delta}$ at the intersection of $\bar{\delta}^{\text{th}}$ row and the δ^{th} column. C_{large} indicates
 306 an arbitrarily large number which prevents switching between two particular stages. For
 307 example, $C_{3 \rightarrow 1} = C_{\text{large}}$ indicating that the firm cannot switch from Stage 3 when storage
 308 has been installed to Stage 1, prior to storage having been installed.

Table 3: Switching Costs

Stage	1	2	3	4	5
1	0	C_m	C	C_{large}	C_r
2	C_{re}	0	C_{large}	C_{large}	C_r
3	C_{large}	C_{large}	0	C_m	C_r
4	C_{large}	C_{large}	C_{re}	0	C_r
5	C_{large}	C_{large}	C_{large}	C_{large}	0

309 4.4 Solution between fixed decision dates, going backward in time 310 from t_{m+1}^- to t_m^+ .

In this section we describe the solution going backwards in time between decision dates, i.e. $t_{m+1}^- \rightarrow t_m^+$. Define the differential operator \mathcal{L} as follows:

$$\mathcal{L}V = \frac{1}{2}b^2 \frac{\partial^2 V}{\partial P^2} + a \frac{\partial V}{\partial P} - Q \frac{\partial V}{\partial S} + (W_w - W_p) \frac{\partial V}{\partial I} + \sum_{u=1, u \neq k}^3 \lambda^{k \rightarrow u} (V(\bar{w} = \bar{W}_u) - V(\bar{w} = \bar{W}_k)) - rV \quad (18)$$

where $a \equiv \epsilon(\mu - \ln P)P$; and $b \equiv \sigma P$.

311 Recall that there is a fixed relationship between water used in production, W_p , and the rate
 312 of oil production $W_p = Q/\eta$.

Define a small time interval h where $h < (t_{m+1} - t_m)$. For $t \in (t_m^+, t_{m+1}^- - h)$, according to the dynamic programming principle, for small h ,

$$V(p, s, \bar{w}, \iota, \bar{\delta}, t) = e^{-rh} \mathbb{E} \left[V(P(t+h), S(t+h), \bar{W}(t+h), I(t+h), \delta(t), (t+h)) \right] \quad (19)$$

$$P(t) = p, S(t) = s, \bar{W}(t) = \bar{w}, I(t) = \iota, \delta(t) = \bar{\delta}$$

313 Letting $h \rightarrow 0$ and applying Ito's Lemma¹⁵, the value function can be shown to satisfy the
 314 following Hamilton-Jacobi-Bellman equation:

$$\frac{\partial V}{\partial t} + \pi(p, s, \bar{w}, \iota, \bar{\delta}, t) + \max_{Q, W_w} (\mathcal{L}V) = 0 \quad (20)$$

Equation (20) is defined on the domain $(p, s, \bar{w}, \iota, \bar{\delta}, t) \in \Omega^\infty$, where

$$\Omega^\infty \equiv [0, \infty] \times [0, S_0] \times Z_{\bar{W}} \times [0, I^{\max}] \times Z_\delta \times [0, T].$$

$$Z_{\bar{W}} = \{\bar{W}_1, \bar{W}_2, \bar{W}_3\}$$

$$Z_\delta = \{\delta_1, \delta_2, \delta_3, \delta_4, \delta_5\}$$

315 T reflects the length of the lease to operate the project. For computational purposes the
 316 domain Ω^∞ is truncated to Ω where

$$\Omega \equiv [0, p_{\max}] \times [0, s_0] \times Z_{\bar{W}} \times [0, I^{\max}] \times Z_\delta \times [0, T]. \quad (21)$$

317 p_{\max} is chosen to be large enough to represent a very high oil price in relation to historical
 318 prices.

319

320 Boundary conditions are elaborated in Appendix A. The numerical solution of the HJB

¹⁵See Björk (2009) for a rigorous overview of optimal decisions under uncertainty characterized by an Ito process in a finance context. Dixit & Pindyck (1994) provides an introductory overview

equation (Equation (20)) is implemented using a fully implicit discretization scheme with semi-Lagrangian time stepping.¹⁶ The details and tests for the accuracy of the numerical solution are provided in the Appendices of Huang (2020).

5 Specification of the parameters

5.1 Oil prices, the discount rate, and exchange rate

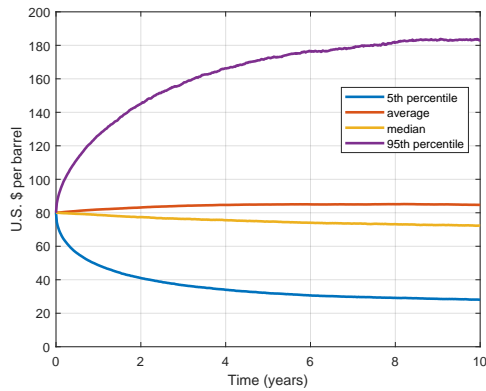
Equation (8) was estimated in the risk neutral measure using futures contract prices on West Texas Intermediate crude oil. Data used was for contracts of less than one month to 17 months, from January 1995 to December 2016. The data were deflated by the U.S. consumer price index so that Equation (8) describes real oil prices. The details of the estimation procedure are described in Huang (2020). The estimates obtained are $\epsilon = 0.14$ (speed of mean reversion), $\mu = 4.59$ (long run log mean price), $\sigma = 0.31$ (volatility).

This estimated model provides a good description of the data with in-sample forecast errors of futures prices ranging from 0.6% to 1.6% depending on the contract length (Huang 2020). Figure 2a shows the mean, median, and 5th and 95th percentiles for 100,000 simulations of the price model assuming an initial starting price of \$80 per barrel. We observe a wide range between the 5th and 95th percentiles, which reflects the quite large volatility term. Recall that this is in the risk neutral measure so it reflects a risk premium demanded by market participants to invest in oil linked assets. For reference, historical WTI prices since 2007, deflated by the U.S. CPI are shown in Figure 2b.

More recently the world oil price has been negatively affected by short term (the COVID-19 pandemic) and long term events (increased pressures to reduce fossil fuel use). To see how an outlook for a lower oil price in the long run would affect our results, we examined a pessimistic price sensitivity with $\mu = 3.69$, implying a long run mean price of U.S. \$40 per

¹⁶A number of papers (d'Halluin et al. 2005, Chen & Forsyth 2007, 2010) introduce the method for solving stochastic optimal control problems. More details can be found in theses d'Halluin (2004) and Chen (2008).

344 barrel. In Section 6, results are described for the base case, and also for the pessimistic price
 345 sensitivity when there are significant differences with the base case.



(a) Simulation of real (2016 U.S. \$) oil prices, Q -measure (Equation 8), 100,000 price realizations



(b) Daily real (2020\$) WTI crude spot prices, U.S. \$/barrel, July 2007 - July 2020

Figure 2: Simulated and historical real oil prices. Source of historical data: Macrotrends, [Historical Oil Prices](#)

346 With regard to the discount of bitumen prices against WTI prices, ρ (see Equation (9)),
 347 as in Insley (2017), we fix it at the level of 83%. In other words, we fix the oil sands price
 348 in Canadian dollars at 83% of the WTI price in US dollars. In reality, the bitumen price
 349 discount is highly variable and could itself be modelled as a second stochastic factor. The
 350 real risk free interest rate is set at 2 percent. The values of oil sands operation are expressed
 351 in \$US using an \$C/\$US exchange rate of 0.85.

352 5.2 Production capacity, reserves and water use intensity

353 We choose a hypothetical plant with a production capacity of 240,000 barrels/day which is
 354 similar in size to Syncrude's Aurora North project.¹⁷ It is further assumed that the resource
 355 base is 880 million barrels, which implies that with extraction at full capacity the reserves
 356 would be exhausted after 10 years. It is assumed that there are 10 years remaining in
 357 the firm's lease with the Alberta Government allowing bitumen extractions from the site.

¹⁷Alberta Energy Regulator (2015a), Oil Sands Magazine (2021)

358 Sensitivities are conducted for different remaining lease lengths up to 30 years.

359 Water conservation has been a focus of oil sands firms for the past decade. Data from
360 the AER shows that from 2015 to 2019 water use intensity varied by firm and over time,
361 ranging from 1.1 to 4.0 barrels of water per barrel of oil, with an average over all firms of
362 2.41 in 2015 and 2.18 in 2019.¹⁸ Water use intensity varies due to factors such as the stage of
363 operations, production targets, and processes used to separate bitumen from oil sands. For
364 our hypothetical oil sands project we adopt Syncrude’s 2019 water-use intensity level of 3.01
365 barrels of water/barrel of oil. Therefore, $\eta = 1/3.01 \approx 0.33$. Given our assumed production
366 capacity of 240,000 barrels/day this implies water demand of 722,400 barrels per day (5.06
367 million barrels per week).

368 5.3 Water withdrawal limits

369 The Alberta’s Phase 1 Framework sets rules for determining water withdrawal limits in
370 different zones, and also explicitly lists for each week how many cubic meters of water per
371 second the oil sands industry is permitted to remove from the Athabasca River in the yellow
372 and red zones based on the historical flow record up to 2007. The weekly water limits in
373 the yellow and red zones for the entire oil sands industry are depicted in Figure 3. As
374 mentioned, the permitted water withdrawal during the yellow and the red zones is allocated
375 almost evenly among the oil sands operators with active projects, according to the water
376 sharing agreement. We assume that the allocation is exactly even among active operators.
377 Note that some operators have more than one mine, and determine how their water allocation
378 is divided across their different mines. Based on five active operators in 2015, the resulting
379 specific weekly water assigned to a firm is listed in Table 4. Each firm’s lowest weekly
380 available water is 7.7 million barrels for the red zone and 10.6 million barrels for the yellow
381 zone.

¹⁸These numbers reflect water use intensity, defined as the quantity of non-saline water that is make-up water, meaning it is extracted from new sources, rather than being recycled water. Source: Alberta Energy Regulator website [Water Use Performance, Oil Sands Mining](#), accessed January 11, 2020, and Alberta Energy Regulator (2019).

382 As noted, the hypothetical oil sands mine is of similar capacity to Syncrude’s Aurora
 383 facility. Syncrude operates the Mildred Lake and Aurora mines which together have a pro-
 384 duction capacity of about 791,000 barrels per day.¹⁹ We assume the hypothetical oil sands
 385 mine is part of an operation similar to Syncrude’s in scale and is allocated water based on
 386 its share of production. Aurora’s production represents about 60% of the total from Mil-
 387 dred Lake and Aurora combined (Alberta Energy Regulator 2019). Hence we assume the
 388 hypothetical mine has a weekly water allocation of 4.6 and 6.3 million barrels in the red and
 389 yellow zones respectively. The hypothetical mine requires 5.06 million barrels of water per
 390 week, and hence the restrictions would be binding in the red zone, but not the yellow zone.

Table 4: Regulated water withdrawal limits for the hypothetical oil sands firm (million barrels/week)

Week	1	2	3	4	5	6	7	8	9	10	11	12	13
Yellow zone	11.6	11.6	10.6	11.6	11.6	10.6	10.6	10.6	10.6	10.6	10.6	11.6	12.6
Red zone	9.7	8.7	8.7	8.7	8.7	7.7	7.7	7.7	7.7	7.7	7.7	8.7	8.7
Week	14	15	16	17	18	19	20	21	22	23	24	25	26
Yellow zone	12.6	14.5	14.5	21.3	24.2	27.1	29.0	32.9	32.9	32.9	32.9	32.9	32.9
Red zone	9.7	12.6	14.5	21.3	24.2	27.1	29.0	32.9	32.9	32.9	32.9	32.9	32.9
Week	27	28	29	30	31	32	33	34	35	36	37	38	39
Yellow zone	32.9	32.9	32.9	32.9	32.9	32.9	32.9	32.9	32.9	32.9	32.9	32.9	31.9
Red zone	32.9	32.9	32.9	32.9	32.9	32.9	32.9	32.9	32.9	32.9	32.9	32.9	31.9
Week	40	41	42	43	44	45	46	47	48	49	50	51	52
Yellow zone	31.0	30.0	27.1	26.1	14.5	14.5	14.5	14.5	13.5	13.5	12.6	12.6	12.6
Red zone	31.0	30.0	27.1	26.1	14.5	14.5	14.5	11.6	10.6	9.7	9.7	9.7	9.7

391 The parameter $\lambda^{k \rightarrow u} dt$ in Equation (5) refers to the hazard rate, which is the instanta-
 392 neous probability of switching from river flow zone k to u in the period of dt . Historical data
 393 of Athabasca river flows indicates that in recent years the river flows are lower compared to
 394 the average historical level. For illustrative purposes, we adopt the relatively low river flows
 395 condition of 2015 for estimating the hazard rates. Based on data from Alberta Environment

¹⁹Alberta Energy Regulator (2015a) and Alberta Energy Regulator (2019) ([Alberta Mineable Oil Sands Plant Statistics Monthly Supplement, December 2015 and 2019.](#))

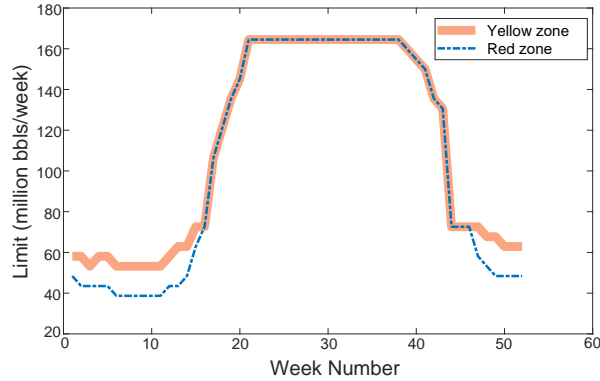


Figure 3: Weekly water withdrawal limits in the yellow and red zones

396 for 2015 river flows, we calculate average values for $\lambda^{i \rightarrow j}$ (for all $i = 1, 2, 3$ and $j = 1, 2, 3$,
 397 where 1 corresponds to the green zone, 2 the yellow zone, and 3 the red zone.) as follows:

398

$$\lambda^{i \rightarrow j} = \frac{N_{i \rightarrow j}}{N_i} \cdot \frac{1}{dt}$$

399 where N_i is the number of weeks in 2015 that are in the zone specified by i , $N_{i \rightarrow j}$ is the
 400 number of times that the zone switches from i to j in 2015, and dt is 1 week.

401 The resulting hazard rate matrix is as follows.

$$\begin{bmatrix} 40.7 & 11.3 & 0 \\ 12.2 & 36.7 & 3.1 \\ 0 & 4.3 & 47.7 \end{bmatrix}$$

402 where the entry at the i^{th} row and the j^{th} column stands for $\lambda^{i \rightarrow j}$. For example, $\lambda_{12} = 11.3$
 403 implies that over one week the probability of switching from the green zone to the yellow
 404 zone is $\lambda_{12}dt = 11.3(1/52) = 22\%$.

405 5.4 Storage and production costs

406 The last five years have witnessed significant decreases in the cost of oil sands production.
 407 A recent Alberta government document states that in response to the collapse of oil prices
 408 in 2014, oil sands operators adjusted to a lower price environment by "new efficiencies and

409 technological advances" (Treasury Board and Finance 2019), resulting in significant reduc-
410 tions in operating costs and sustaining capital costs. Operating costs for oil sands mining
411 are reported to have declined from C\$34.9 to C\$27 per barrel, while sustaining capital costs
412 declined from \$6 to \$3.8 per barrel between 2014 and 2018. For this study assumptions
413 for the operating and sustaining capital costs of oil sands facilities are based on estimates
414 provided by the Canadian Energy Research Institute (CERI) (Millington & Murillo (2015)),
415 appropriately scaled for the size of the hypothetical project. In light of cost reductions since
416 2015, the CERI estimated costs were reduced by 30%. The resulting costs are given in Ta-
417 ble 5 for energy and non-energy variable costs, fixed operating costs, sustaining capital costs
418 and abandonment costs²⁰ where all of these costs are 70% of values estimated in Millington
419 & Murillo (2015). We will comment on the effects of these cost reductions in the Section
420 6.5.

421 About 80 percent of the water used in oil sands is recycled, (Canada 2015). The Alberta
422 government has maintained a zero discharge policy, meaning that all oil sands process water
423 must be contained on site in tailings storage facilities and no releases into the environment
424 are permitted. The buildup of large volumes of waste water in tailing ponds has caused the
425 Alberta government to consider allowing limited releases of liquid waste into the Athabasca
426 River, provided the wastewater has been treated (Orihel & Reynolds 2020). While the cost
427 of maintaining tailings ponds is included as part of capital and operating costs, there is no
428 consideration given in this paper to the potential costs of water treatment.

429 Information on water storage capacity was obtained from Imperial Oil's description of
430 their Kearl oil sands project, which commenced production on April 27, 2013²¹. Like the
431 Kearl project it is assumed that storage can sustain 30 days' production during the dry
432 season, which implies a water storage capacity of about 24 million barrels. A report of Golder
433 Associates Ltd. (2015) showed that the capital cost for fresh water storage is C\$16/m³ and
434 the annual operating costs for the storage is 5% of capital cost plus relevant power costs. The

²⁰Note that abandonment costs are assumed to be 2% of the original capital costs for the oil sands facility, estimated at \$17 billion. Using the 30% cost reduction factor abandonment costs are set at \$238 million.

²¹Source: Information provided on the website of Imperial Oil (http://www.imperialoil.ca/Canada-English/operations_sands_kearl_environment.aspx) (accessed on January 11, 2020).

435 assumed capacity of our water storage (I^{\max}) is 24 million barrels or 2.87 cubic meters which
 436 implies a capital cost of C\$46 million. Applying the cost reduction factor gives a capital cost
 437 (C) of C\$32 million and the fixed cost of running the facility (c_f^s) of C\$1.6 million/year. In
 438 the absence of publicly available information, it is assumed that the variable cost of operating
 439 the storage capacity (c_v^s) is C\$ 0.0024/barrel. It is further assumed that the construction of
 440 the storage pond can be accomplished instantaneously.

441 Table 5 details the parameter value assumptions for the hypothetical project in the base
 442 case including cost assumptions noted above, as well as the carbon tax, royalty rates²²,
 443 exchange rate and risk free interest rate.

444 6 Results

445 We examine four different scenarios to highlight the impact of different river conditions and
 446 the strictness of water withdrawal limits. Regarding the former, we contrast results with
 447 river conditions as they were in 2015 (the wetter scenario) with a drier scenario in which
 448 the river is always in the red zone. Figure 4 shows the two examined river flow conditions
 449 with a box plot of historical weekly river flows. The boxplots indicate the first quartile
 450 (represented by the lower edge of each box), the third quartile (the upper edge of each box),
 451 the median (the short horizontal bar cutting through each box), the maximum level (the
 452 highest tip of the dashed whisker), the minimum level (the lowest tip of the dashed whisker),
 453 and outliers (the plus signs) of the historical weekly river flow rate. We observe that 2015
 454 was drier than the historical record for flow levels, while red zone flow levels are even drier.
 455 Both the wetter and drier river conditions are examined using (i) Phase 1 restrictions and
 456 (ii) stricter regulations in which withdrawals in the red and yellow zones are tightened by
 457 1.35 million barrels per week which represents up to 30% and 42% of the weekly withdrawal
 458 limit, respectively. We summarize the four scenarios in Table 6.

²²The royalty rate differs between the pre-payout and the post-payout phases of a project. Before the point that a project's cumulative revenues start to cover its cumulative costs, it is in the pre-payout phase. After this point, it is in the post-payout phase. Without altering the qualitative results of our research, we assume that the studied project is in the pre-payout phase.

Table 5: Base case parameter values

Parameter	Description	Reference	Assigned Value	Source
	Extraction method		Surface mining	***
$T - t_0$	Remaining lifespan of the project (years)	Equation (7)	10	*
\bar{q}	Production capacity (million barrels/year)	Equation (1)	88	*
s_0	Remaining established reserves (million barrels)	Equation (7)	880	*
η	Productivity of water (barrels of bitumen/barrel of water)	Equation (1)	0.33	**
\bar{W}_1	Water withdrawal constraint in the green zone (million barrels/week)	Equation (4)	$+\infty$	***
\bar{W}_2, \bar{W}_3	Water withdrawal constraint in the yellow zone and the red zone (million barrels/week)	Equation (4)	refer to Table 4	*
ρ	Discount of bitumen prices against WTI prices	Equation (9)	83%	*
C	Construction cost of the water storage (million C\$)	Table 2	32	*
I^{\max}	Water storage capacity (million barrels)	Equation (3)	24	*
c_f^s	Fixed cost of water storage (million C \$/year)	Equation (9)	1.6	*
c_v^s	Variable cost of water storage (C \$/barrel)	Equation (9)	0.0024	*
	Carbon emissions (tonnes/barrel)	Equation (9)	0.091	**
c_{ve}^o	Energy variable operating cost (% of the WTI price)	Equation (9)	1.13	**
c_{vne}^o	Non-energy variable operating cost (C \$/barrel)	Equation (9)	5.59	**
c_f^o	Fixed operating cost (million C \$/year)	Equation (9)	402	**
c_s	Sustaining capital cost (million C \$/year)	Equation (9)	400	***
	Income tax rate (%)	Equation (9)	25	***
	Carbon tax (C \$/tonne)	Equation (9)	10 (Jan 2020~Mar 2020) 20 (Apr 2020 ~ Mar 2021) 30 (Apr 2021 ~ Mar 2022) 40 (Apr 2022 ~ Mar 2023) 50 (Apr 2023 ~)	***
	Royalty rate (%)	Equation (9)	1 when $P < \$55/\text{barrel}$ 9 when $P > \$120/\text{barrel}$ ($0.12P - 5.77$) otherwise	***
C_m	Mothball cost (million C \$)	Table 2	0	*
C_{re}	Reactivating cost (million C \$)	Table 2	0	*
C_{large}	A large number to prevent stage switching (million C \$)	Table 2	10^9	*
C_r	Abandonment cost (million C \$)	Table 2	238	*
ϵ	Speed of reverting to the mean log oil price	Equation (8)	0.14	***
μ	Long run mean log oil price	Equation (8)	4.59 (3.69 sensitivity)	***
σ	Volatility of oil prices	Equation (8)	0.31	***
	Hazard rate of switching			
$\lambda^{1 \rightarrow 2}$	from the green zone to the yellow zone,		11.3	
$\lambda^{1 \rightarrow 3}$	from the green zone to the red zone,		0	
$\lambda^{2 \rightarrow 1}$	from the yellow zone to the green zone,	Equation (5)	12.2	***
$\lambda^{2 \rightarrow 3}$	from the yellow zone to the red zone,		3.1	
$\lambda^{3 \rightarrow 1}$	from the red zone to the green zone,		0	
$\lambda^{3 \rightarrow 2}$	and from the red zone to the yellow zone		4.3	
r	Real risk free interest rate	Equation (16)	0.02	*
	U.S. - Canada exchange rate, \$U.S./\$C	NA	0.85	*

Source column: *** means these values are publicly available or are estimated from empirical evidence. ** means these values are derived according to AOSIQU, Alberta Energy Regulator (2015b), or CERI's report ((Millington & Murillo 2015) . * means these values are assumed by referring to miscellaneous sources, which are specified in the text

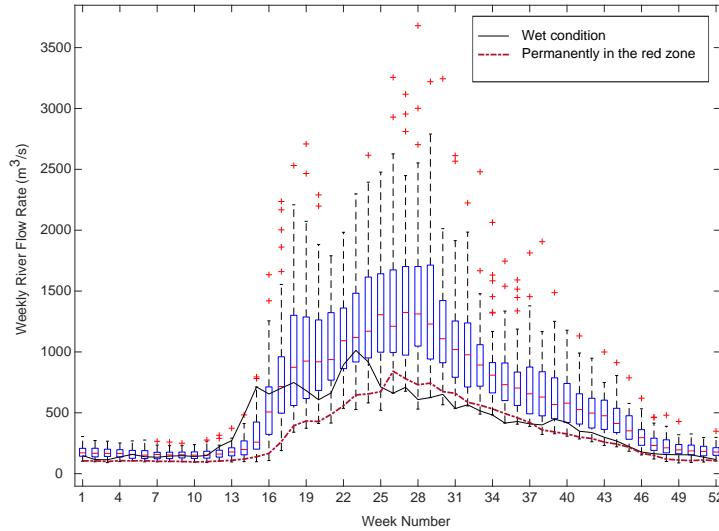


Figure 4: Curves Showing the Assumed Wet and Dry Weekly River Flow Rates versus the Box Plots of Historical Weekly River Flow Rates for Oct. 1 1957 to Dec. 31, 2017. Week 1 is the first week in January.

Scenario label	River Conditions	Water withdrawal limits
W_L (wetter lenient)	2015 conditions	Phase 1 limits
W_S (wetter strict)	2015 conditions	Phase 1 less 1.35 mm bbl per week
D_L (drier lenient)	always in red zone	Phase 1 limits
D_S (drier strict)	always in red zone	Phase 1 less 1.35 mm bbl per week

Table 6: Scenario descriptions

459 6.1 The firm with no storage option

460 Water regulations will have the largest impact when the firm has no technological option
 461 available to alleviate water shortages. Note also that a reliance on water storage has been
 462 the subject of controversy due to potential negative environmental consequences as discussed
 463 in Di Baldassarre et al. (2018). Figure 5 depicts the solution surface for W_L, which shows
 464 the project's values, at time zero²³, corresponding to different combinations of the oil sands
 465 resource stock and crude oil price when the present (i.e. time zero) river flow condition is in
 466 the green zone. This graph depicts project value for different values of the state variables,
 467 assuming the project owner acts optimally in the choice of controls until the lease end date

²³At time zero, there are still 10 years left until the oil extraction lease expires.

$P(t = 0)$	No restrictions	W_L	W_S	W_S vs no restrict.	D_L	D_S	D_S vs no restrict.
\$40	15,773	15,733	15,444	-2.1%	15,626	14,549	-7.8%
\$100	28,301	28,223	27,667	-2.2 %	28,038	26,161	-7.6%

Table 7: Sample project values highlighting comparison of no restrictions, strict and lenient scenarios when no storage option is available. US \$ millions. Scenarios are defined in Table 6

468 at time T . As expected, other things equal, the project's value rises with an increase in oil
 469 price as well as with an increase in resource stock. When the present (time zero) river flow
 470 condition is in either of the other zones, the shape of the solution surface is very similar to
 471 that in Figure 5, and hence additional scenarios are not shown.

472 To compare the project values across the four scenarios, Figure 6 shows the present value
 473 of the project at time zero versus the oil price, given the resource stock at the maximum
 474 level of 880 million barrels and the river is in the red zone. The comparison is similar for
 475 other levels of reserves. The upper set of curves depicts the base case scenarios and the
 476 lower set depicts the pessimistic oil price sensitivity. For reference, a case when there are
 477 no water restrictions is also shown. Referring first to the base case, it may be observed that
 478 the stricter the water withdrawal limits or the drier the river flow condition, the lower the
 479 project's value; however in general the differences are small. Selected values are shown in
 480 Table 7 where we observe that the values for the scenarios with lenient regulations (W_L
 481 and W_S) are very close to the values under no restrictions at all. In addition, with a time
 482 zero oil price of the \$40/barrel, the project's value is reduced by \$329 million or 2.1% in
 483 W_S compared to the scenario with no restrictions. Spread over the total reserves of 880
 484 million barrels, this amounts to \$0.37 per barrel of oil reserves. This difference is greater
 485 under dry river conditions. Project value under D_S is 7.8% (or \$1224 million) lower than
 486 under no restrictions, which amounts to \$1.39 per barrel of oil reserves. We observe a similar
 487 pattern for the pessimistic oil price sensitivity, but the relative differences are larger (See
 488 Table 10 in Appendix B.)

489

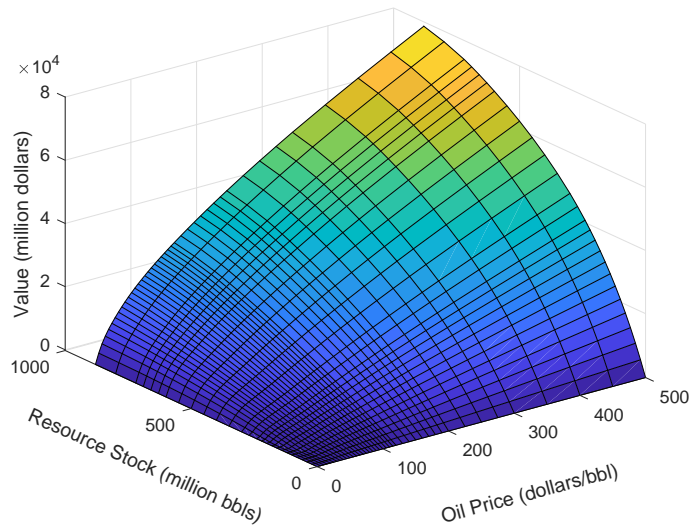


Figure 5: Project present value (US \$) versus present price and resource stock at time zero for W_L. (River flow condition is in the green zone and there is no option to install a water storage facility.)

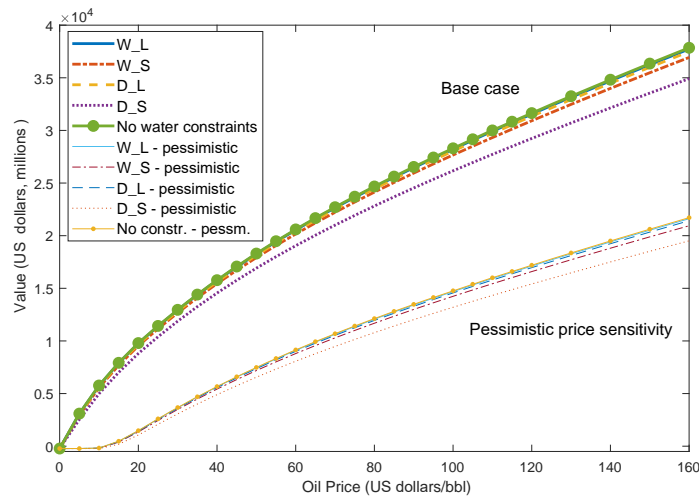


Figure 6: Comparison between scenarios: Project present value (US \$) versus present price at time zero if the present resource stock level is 880 million barrels, the river flow condition is in the red zone, and there is no option to install a water storage facility.

490 Project abandonment will occur when reserves run out, when the lease ends, or when the
491 oil price is so low that the firm is better off abandoning rather than maintaining an active
492 mine. Abandonment requires the firm to pay rehabilitation costs, but the firm thereby avoids
493 the costs of the oil sands operation. Rather than abandoning, the firm also has the option to
494 suspend production but still incurs the large annual sustaining capital costs, which at C\$400
495 million exceed the abandonment cost of C\$238 million.

496 The strictness of water withdrawal limits will affect a firm's decision about when to
497 permanently abandon a project. If water withdrawal restrictions become suddenly stricter
498 such that the project value is negative, then the optimal decision is to abandon the project
499 immediately. However if it remains optimal for the firm to continue the project, the effect
500 of stricter limits is not immediately obvious due to two opposing effects. First stricter water
501 restrictions imply reduced production in dry periods, which the firm will try to make it up in
502 wetter periods. This might delay the abandonment time. On the other hand, stricter water
503 restrictions reduce the value of the project which increases the probability of abandonment in
504 the future. We investigate this effect for our hypothetical project by examining critical prices
505 to abandon the project. If the oil price is greater than the critical price, the firm's optimal
506 choice is to continue the project; otherwise, it should shut down the project permanently. A
507 lower critical price for abandonment implies a longer expected time before abandonment.

508 Table 8 lists the critical prices to abandon the project from the suspended state at time
509 zero for the four scenarios and for different levels of oil reserves.²⁴ The table shows critical
510 prices of zero if remaining reserves are 200 million barrels or greater, implying the project
511 would never be abandoned. At lower reserve levels, abandonment is optimal for prices
512 ranging from \$5 to \$20 per barrel. Overall there is little change in critical prices between
513 strict and lenient regulations. Table 11 in Appendix B shows critical prices for abandonment
514 for the pessimistic price sensitivity. There are higher critical prices for abandonment at some
515 remaining reserve levels in the D_S scenario compared to the D_L scenario, but overall the

²⁴For succinctness, we do not show critical prices to abandon the project if in the operating state. At higher reserve levels (above 80 million barrels), critical prices to temporarily suspend the project are always greater than or equal to critical prices to abandon the project from the operating state. This implies for reserve levels above 80 the project will be suspended prior to abandonment.

From suspended stage (Stage 2) to abandonment (Stage 5)								
Resource stock (million barrels)	W_L			W_S			D_L	D_S
	green	yellow	red	green	yellow	red	red	red
0	H	H	H	H	H	H	H	H
20	20	20	20	20	20	20	20	20
40	20	20	20	20	20	20	20	20
60	15	15	15	15	15	20	20	20
80	15	15	15	15	15	15	15	20
120	10	10	10	10	10	10	10	10
140	5	5	5	5	5	5	5	10
180	5	5	5	5	5	5	5	5
200 - 880	0	0	0	0	0	0	0	0

Table 8: Critical prices at time zero to abandon the project while there is no option to install water storage (US \$/barrel). 'H' refers to a very large number implying it is always optimal to abandon the project when the resource stock is 0.

516 effect is small.

517 6.2 Option to install a water storage facility

518 Figure 7 compares project values with and without the option to install storage and Table
519 9 provides some selected values. As expected this option makes the project more valuable,
520 but the effect is only significant for the D_S scenario where the value with the storage
521 option exceeds that when there is no storage available by over 7% at both \$40 or \$100 per
522 barrel for the time zero oil price. For the other scenarios the percent differences are smaller
523 (0.1%, 2.1%, and 0.8% respectively for scenarios W_L, W_S, and D_L at a time zero oil
524 price of \$100/ barrel.) (The increased value with storage available is relatively larger for the
525 pessimistic price sensitivity, i.e. 0.2%, 3.3%, 1.1%, and 11.1% for W_L, W_S, D_L, and
526 D_S, respectively. See Figure 13 in the Appendix B.) It may also be observed from Table
527 9 that the difference in project value between scenarios is tiny - less than 1%. Note that
528 the value with no restrictions is the same whether or not storage is installed. Storage only
529 provides value to the firm when water restrictions are imposed.

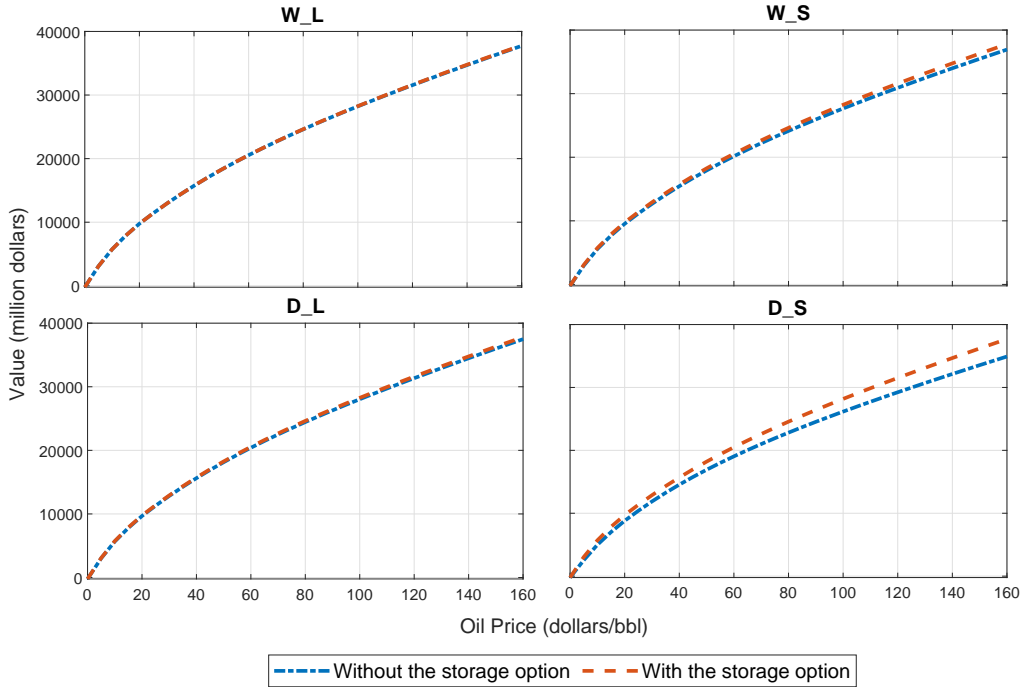


Figure 7: Comparing the project values (US \$) at time zero in different scenarios with and without the option to install a water storage facility; resource stock level is 880 million barrels, the river flow condition is in the red zone.

$P(t = 0)$	No restrict.	W_L	W_S	W_S vs no restrict.	D_L	D_S	D_S vs no restrict.
\$40	15,773	15,738	15,726	-0.2%	15,730	15,584	-0.3%
\$100	28,301	25,258	28,249	-0.2 %	28,258	28,179	-0.4%

Table 9: Sample project values at time zero, highlighting comparison of no restrictions, strict and lenient scenarios when the storage option is available. US \$ millions. Scenarios are defined in Table 6

530 Given uncertain future oil prices and water restrictions, the firm chooses the timing to
 531 install the water storage facility to optimize the present value of the project. The critical
 532 prices to switch from stage 1 (operating, no storage) to stage 3 (operating, with storage)
 533 indicate the optimal strategy for the decision to invest in water storage. If the crude oil price
 534 is greater than the critical price, it is optimal to invest in storage, otherwise the investment
 535 should be delayed. The critical prices depend on the state variables including present river
 536 flow conditions as well as the resource stock level. Figure 8 depicts critical prices to proceed
 537 to stage 3 at different resource stock levels for the four scenarios. It is observed that critical
 538 prices to install storage are much higher for low reserve levels, implying that for smaller
 539 resource stocks (or as reserves are depleted) it is less likely to be optimal to make the
 540 investment in water storage. Critical prices are also significantly lower (implying the firm is
 541 more likely to install storage) when river conditions are drier (comparing red and green zones)
 542 and water restrictions are more severe (D_L and D_S versus W_L and W_S, respectively).

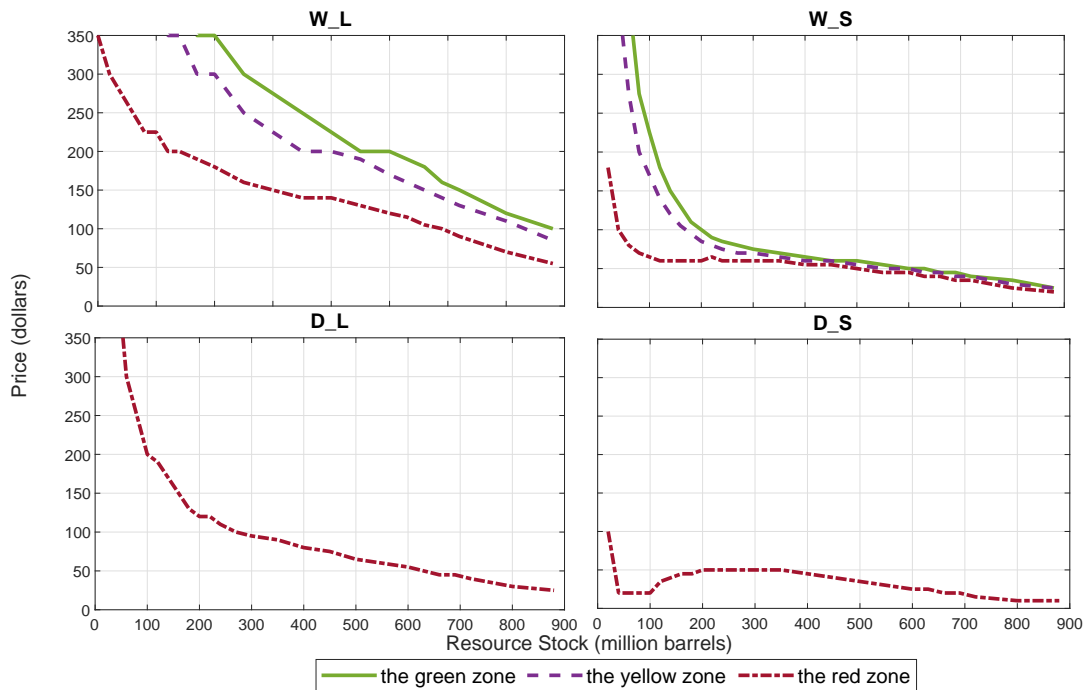


Figure 8: Critical prices (US \$) at time zero to proceed from stage 1 (operating, no storage) to stage 3 (operating, with storage) for different time zero resource stock levels in the four scenarios

543 In Section 6.1 it was observed that even without the option to install storage, the crit-

544 ical prices for abandoning the project are fairly low and are not very sensitive to different
 545 scenarios. When the option to install storage is available it will be even less likely that the
 546 project will be abandoned before the end of the lease at time T . Our results confirm this
 547 with critical prices for abandonment that are the same as or lower than when there is no
 548 storage option. (These critical price tables are not shown.)

549 6.3 The marginal cost of stricter water withdrawal constraints

550 In this section we calculate the marginal costs of water withdrawal restrictions. We define
 551 marginal cost to be the change in the expected value of the project to the firm, at time
 552 zero, caused by a marginal reduction in allowed water withdrawals in all future time periods.
 553 This is a long run marginal cost, in that it is assumed the firm will respond optimally to
 554 the change in water restrictions, and may adopt new technology through the installation of
 555 storage. The marginal cost estimate provides a lower limit for the marginal benefits needed
 556 in order for the regulation to be welfare enhancing. The marginal cost also indicates a firm's
 557 willingness to pay for water, and hence would be the price expected if a water trading scheme
 558 were implemented.

559 The marginal cost of increased restrictions depends on the value of the state variables.
 560 We estimate the marginal cost of the restrictions to the hypothetical firm, MC , by taking the
 561 present value of the hypothetical firm $V(p, s, \bar{w}, \iota, \bar{\delta}, t)$, in a given river zone where $\bar{W} = \bar{w}$,
 562 at a specific oil price level, $P = p$, at a certain oil stock level, $S = s$, and finding the change
 563 in $V(p, s, \bar{w}, \iota, \bar{\delta}, t)$, when the permitted withdrawal rates in the yellow and red zones are
 564 further restricted by $\Delta\bar{w}$ ²⁵ over the lifespan of the project, i.e. $T - t_0$. That is to say,
 565
$$MC = \frac{\Delta V(p, s, \bar{w}, \iota, \bar{\delta}, t)}{\Delta\bar{w} \cdot (T - t_0)}.$$

566 The marginal cost of increased restrictions is mapped out for a range of initial water
 567 restrictions and shown in Figure 9 below. The figure is shown for an initial oil price of \$50
 568 per barrel and assuming the oil stock is at its maximum level. The horizontal axis shows

²⁵Due to the accuracy of the numerical method the smallest marginal change that can be examined is 1 million barrels of water per week over the lifespan of the project. The change in the firm's present value is in millions of dollars.

569 the adjustment of the level of available water for the oil sands mining sector, with water
 570 constraint regulations becoming more strict in all future time periods, moving from right to
 571 left. The point labeled as 0 reflects the restrictions as in the Phase 1 framework. Moving to
 572 the left, -119 means that the water withdrawal limits in the red and yellow zones have been
 573 reduced by 2.3 million barrels each week (or 119 million barrels each year) compared to the
 Phase 1 framework; moving to the right +119 implies a comparable relaxing of restrictions.

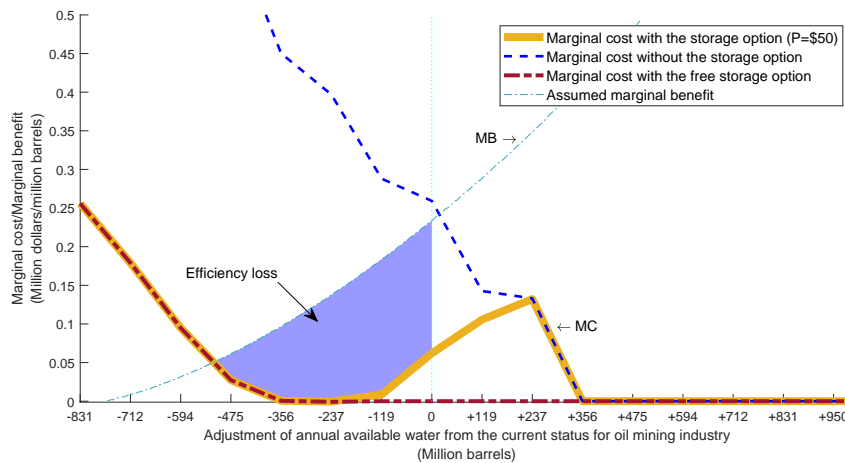


Figure 9: Marginal cost (MC) per barrel of water of stricter water constraints at time zero. US\$. Firm in stage 1 (operating, no storage) vs. water constraint levels. Oil price = US \$50/barrel. Resource stock at the maximum level. River flow in the green zone. Also shown is a hypothetical environmental marginal benefit curve (MB).

574

575 For a given stage of operation, in general it would be expected that the marginal cost of
 576 water restrictions would decline as restrictions become less onerous, moving from left to right
 577 on the graph. However the curve in Figure 9 is non-monotonic with several distinct regions.
 578 This reflects the long run nature of the curve in which the option to install water storage
 579 affects the marginal cost. Further, the storage installation represents a lumpy asset which
 580 cannot be acquired in small increments. To interpret this graph it is helpful to consider each
 581 of four regions, and observe the critical price to install storage in each region.

- 582 • +237 and greater: MC curve has a zero or negative slope. Critical prices to install
 583 storage are infinite, indicating it is never optimal to install storage.

584 • -119 to + 237: MC curve is positively sloped. Critical prices to install storage are
 585 positive indicating it may be optimal to install storage at some future time if the price
 586 of oil exceeds the critical price.

587 • -831 to -119: MC curve has zero or negative slope. Critical prices to install storage
 588 are below the time zero price of \$50/barrel, hence it is optimal to install storage
 589 immediately.

590 For further intuition we plot on the same graph the marginal cost curves for when there is
 591 no storage available (blue dashed curve) and when storage is freely available (red dashed
 592 curve) (and hence is a free option which will always be exercised.) It can be seen that the
 593 marginal cost curve for the firm in stage 1 with the storage option falls between these two
 594 other cases.

595 We are unable to determine the efficient level of water restrictions as we do not have an
 596 estimate of the benefits to the ecosystem of an additional unit of water flowing in the river.
 597 A hypothetical marginal benefit curve is shown in Figure 9 indicating an efficient level of
 598 restrictions of about -500 million barrels relative to the Phase 1 restrictions at point 0. The
 599 efficiency gain of moving from Phase 1 to -500 is indicated by the blue shaded area. In
 600 general, the efficiency loss when the restrictions are not at the optimal levels depends on the
 601 slopes and locations of the marginal benefit curve and the marginal cost curve. Note that if
 602 the marginal benefit curve crossed the rising portion of the marginal cost curve, then there
 603 would be no unique point where $MB=MC$. In this circumstance, the total benefits and total
 604 costs would need to be examined for a range of restrictions to find the optimum.

605 The marginal cost of restrictions will depend on the state variables, such as the oil
 606 price and the river conditions, in particular. Figure 10, displays a marginal cost curves
 607 for different oil prices levels at time zero as well as the assumed marginal benefit curve.
 608 It will be observed that different levels of the current oil price imply a different efficient
 609 water constraint. A similar figure can be drawn for different river conditions at time zero.
 610 This figure (not shown) indicates significantly higher marginal costs when in the dry river
 611 conditions. It is impractical to change the level of water restrictions based on these changing

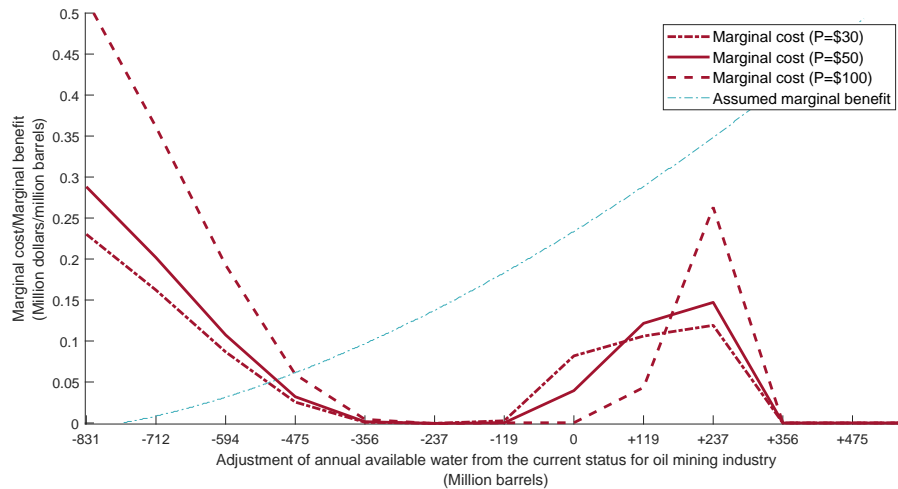


Figure 10: Marginal cost (MC) per barrel of water at time zero of stricter water constraints vs. water constraint levels for different oil prices. US\$. Firm in stage 1 (operating, no storage). Resource stock is at the full level. River flow in the green zone. Also shown is a hypothetical environmental marginal benefit curve.

612 states which shift the marginal cost curve. However this highlights the fact that quantitative
 613 water restrictions have a varying cost for firms depending on current conditions, which has
 614 implications for the efficiency consequences of the regulations.

615 6.4 The effects of price volatility

616 Oil price volatility, σ in Equation (8), is of interest for at least two reasons. First, given that
 617 the current oil price has a significant impact on the marginal cost of restrictions, it is worth-
 618 while exploring the effect of the price volatility assumption on the marginal cost. Second,
 619 asset price volatility is a much studied phenomenon in the “investment under uncertainty”
 620 literature. It is well known that for a simple investment options, an increase in volatility
 621 results in the delay of the investment (Majd & Pindyck (1987)). This section explores how
 622 an increase in volatility would affect the decision to install storage.

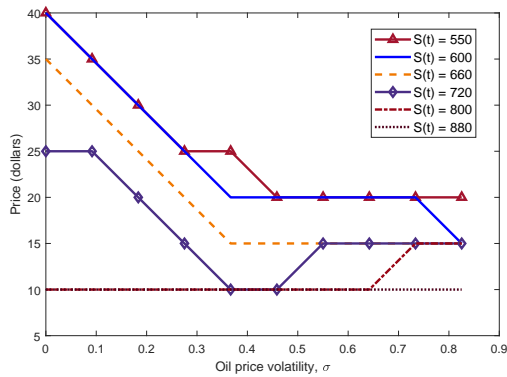
623 We compared the marginal cost and total cost of stricter water regulations for a variety of
 624 volatility assumptions. In all scenarios, the marginal and total costs of the regulations did not
 625 change substantially under different volatility assumptions. For example, when restrictions

626 are set according to the Phase 1 Framework and time zero river conditions are in the red
627 zone, a doubling of σ from 0.9 to 1.8 reduced the marginal cost from \$1.43 per barrel to
628 \$1.40 per barrel. Increasing volatility has several effects, and whether the marginal cost will
629 rise or fall depends on the case being examined. An increase in volatility can increase the
630 value of the oil producing asset, as there will be more high price realizations which increases
631 revenue, while the effect of low price realizations is muted by the option to temporarily
632 suspend operations. On the other hand, more restrictive water limitations reduce the ability
633 of the firm to take advantage of high prices. In this study, the net effect, at time zero, of an
634 increase in volatility is a slight reduction in the cost of restrictions.

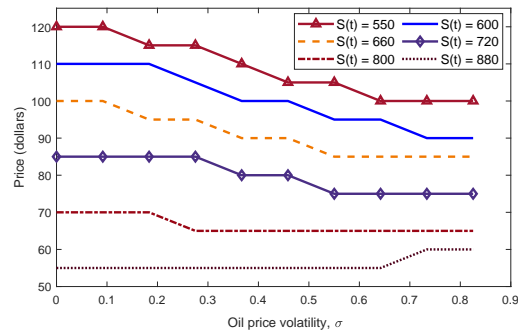
635 To consider the effect of changing volatility on the decision to invest in storage, Figures 11
636 plots critical prices to install storage versus volatility for several scenarios. Looking first
637 at the D_S scenario in the red zone (Figure 11a), the critical prices are observed to fall
638 as volatility increases, implying that higher volatility results in an earlier investment in
639 storage. This contrasts to the result for simple investment options noted above. Intuitively
640 in this scenario, when water flows are reduced and water withdrawals are heavily constrained,
641 an increase in price volatility makes storage more valuable to the firm. Without storage
642 and under binding water constraints, the firm may not be able to take advantage of a
643 sudden upswing in prices. Hence the more volatile prices increase the desirability of storage.
644 Figure 11b shows a similar effect for the W_L scenario in the red zone for most of the
645 reserve levels plotted. However for W_L in the green zone, shown in Figure 11c, critical
646 prices as volatility rises. In this scenario water withdrawals are only mildly constrained, and
647 hence increases in volatility tend to delay investment, as per the normal effect of uncertainty.
648 Figure 15 in the appendix A shows the same information for the low price sensitivity. Again,
649 the impact of price volatility varies with the level of water restrictions.

650 **6.5 Changing costs and water use intensity**

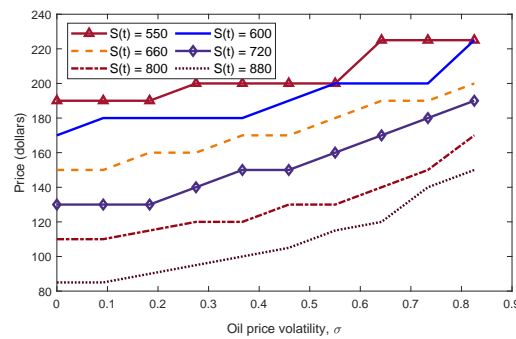
651 The cost of water regulations have changed over time as the oil sands industry has responded
652 to economic pressures and environmental concerns. As noted in Section 5.4 there has been a



(a) D_S in the red zone



(b) W_L in the red zone



(c) W_L in the green zone

Figure 11: Critical prices at time zero to install storage versus volatility for different scenarios in the red and green zones.

653 significant decline in capital and operating costs since 2015. To investigate the effect of this
 654 improved efficiency we redid the numerical example using capital and operating costs as of
 655 2015, which are 30% higher than those assumed for 2019. With higher costs, the value of
 656 the oil sands operation is reduced by 7-15% depending on the oil price at time zero. For the
 657 pessimistic price sensitivity, the reduction in value ranges from 15-40 %. With higher costs
 658 impact of water restrictions is more evident. For example, the marginal cost of restrictions
 659 in the base case as depicted in Figure 9 ranges from 0 for more lenient restrictions (-119 on
 660 the horizontal axis) to \$0.25 million at the tightest restrictions (-831 on the horizontal axis).
 661 With 2015 costs, the comparable portion of the marginal cost curve ranges from 0 to \$0.42
 662 million.

663 Over the last two decades, water productivity has improved as efforts have been made to
 664 increase water recycling, although non-saline water use also shows considerable variability
 665 from year to year, as is indicated on the AER’s website (Alberta Energy Regulator 2021).
 666 The AER reports that between 2015 and 2019, Syncrude’s intensity of water use has ranged
 667 from 2.84 barrels water/barrel of oil to 4.04 barrels water/barrel of oil. For our analysis we
 668 used the 2019 value of 3.01 for water intensity (which gives $\eta = 0.33$). When the intensity
 669 of water use is 2.5 barrels water/barrel of oil or less, we find that there is no need to invest
 670 in a water storage facility regardless of the river flow zone and there is no cost to the firm of
 671 the water restrictions. Figure 12 displays the marginal costs of restrictions under different
 water intensity assumptions.

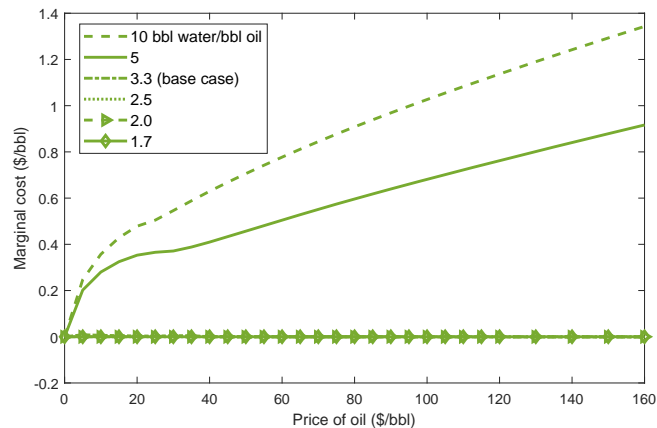


Figure 12: Marginal cost of restrictions per barrel of water versus oil prices, at time zero, for different water use intensities (barrel water/barrel oil). Scenario W_L in the green zone. The marginal cost refers to the loss in value to the project on a \$/barrel of water basis of an increase in water withdrawal restrictions as outlined in Section 5.3, page 23.)

672

673 6.6 Changing the lease end date, T

674 The base case assumption for the time remaining in the mining lease is ten years, $T = 10$.
 675 Sensitivities were conducted for T extending to 30 years. A longer lease length provides
 676 more flexibility to the oil sands firm in terms of the timing of extraction. The firm can more
 677 easily adapt to unfavourable events such as water restrictions or low oil prices by postponing

678 production to the future. Assuming $T = 30$ years, the total value of the project increases
679 significantly, however the qualitative conclusions regarding the impact of water restrictions
680 are the same. For example, Table 7 shows how project value declines under stricter water
681 regulations given $T = 10$. For $T = 30$, the effect in percentage terms is somewhat less. In
682 particular when $T = 30$ and there is no option to install storage, project value in the W_S
683 scenario is 1 to 2 percent lower than the W_L scenario, while project value in the D_S
684 scenario is 4 to 5 percent lower than in the D_L scenario. The conclusion is unchanged that
685 the relative cost of water restrictions is quite low. The option to install storage increases
686 project value, but by a lesser amount in percent terms when $T = 30$. For example, at an
687 initial oil price of \$100/bbl in the D_S scenario, the option to add storage increases project
688 value by about 4 percent compared to the 7.7 percent that was reported in Section 6.2 for
689 $T = 10$. Because the benefit of storage is reduced, the critical prices that would induce a
690 firm to invest in storage are increased.

691 7 Concluding comments

692 This paper studies the cost of regulations designed to limit river water withdrawals by a
693 large mining operation in order to protect surrounding ecosystems. A stochastic optimal
694 control approach is used to model the impact of these restrictions on firm profitability and
695 to estimate the marginal cost to the firm of imposing stricter regulations. The marginal cost
696 estimates are an important input to regulatory design, as they represent the shadow prices of
697 water for the firm and may be considered as minimum values required for the environmental
698 benefits to justify the regulation. The methodology and conclusions from this analysis of a
699 hypothetical oil sands mining operation can inform the assessment of regulations for other
700 types of resource extraction projects. Some key observations and findings of this paper are
701 summarized below.

- 702 • **Estimates of the cost of regulations should be forward looking, reflecting the**
703 **change in firm value under different regulatory rules.** The analysis showed that

704 the marginal cost of changing regulations depends critically on assumptions about key
705 state variables, such as future river conditions and the price of oil. Modelling the firm's
706 decisions as a stochastic dynamic optimal control problem incorporates the uncertainty
707 in both of these factors and demonstrates how the cost of regulations depends on a
708 firm's optimal responses.

- 709 • **Impact of investment in water storage technology.** The option to install storage
710 reduces the marginal cost of restrictions. This indicates the importance of considering
711 potential technological investments in response to regulations.
- 712 • **Low cost of the regulations.** Alberta's Phase 1 Water Management Framework
713 does not impose a large cost on firms, given historical river flow conditions of the
714 Athabasca River. The cost of restrictions has fallen since the regulations were first
715 implemented, as firms made investments to improve the efficiency of their operations.
716 The costs remain low even under assumptions of much drier conditions.
- 717 • **Balancing the benefits and costs of regulations.** There is considerable uncer-
718 tainty about how much water can be safely diverted from the river without harming
719 the aquatic ecosystem. Given the low marginal cost estimates, this analysis reveals
720 that there is scope for adopting stricter regulations if there is a desire to provide added
721 protection for in-stream river flows.
- 722 • **Impact of future oil prices.** An outlook for a lower long run average oil price
723 increases the marginal cost of restrictions as a percent of mine value. This is an
724 important consideration given worldwide commitments to reduce oil consumption to
725 limit carbon emissions, which would put downward pressure on future oil prices.
- 726 • **Non-monotonic impact of increasing price volatility.** It is well known in the
727 finance literature that for a simple investment option, increased price volatility is likely
728 to delay the optimal investment timing. However, we find that under very dry river
729 conditions, increased volatility can reduce the critical price required to install storage,
730 implying that the expected time for the investment is sooner. As price volatility is

731 increased, high price realizations become more likely, which increases the value of the
732 ability to ramp up production, making storage more valuable to the firm. In contrast,
733 under more plentiful water conditions when water restrictions are less binding, an
734 increase in oil price volatility can delay the optimal investment in water storage as per
735 the normal effect.

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907

908 A Boundary conditions

909 Boundary conditions must be established for the state variables t , P , S , and I .

- 910 • At $t = T$ if the project has not previously been abandoned, reclamation costs will be
911 paid of amount $-C_r$. Therefore $V = -C_r$ for $\delta \in [\delta_1, \delta_2, \delta_3, \delta_4]$. For $\delta = \delta_5$, $V = 0$
912 at $t = T$ as reclamation will already have been carried out so that the value will not
913 change.
- 914 • As $P \rightarrow 0$, the volatility term of the stochastic differential equation describing P
915 (Equation (8)), goes to zero. Hence we can just solve the HJB equation along the
916 boundary at $P = 0$. The differential operator becomes:

$$\mathcal{L}V = -Q \frac{\partial V}{\partial S} + (W_w - W_p) \frac{\partial V}{\partial I} + \sum_{u=1, u \neq k}^3 \lambda^{k \rightarrow u} (V(\bar{w} = \bar{W}_u) - V(\bar{w} = \bar{W}_k)) - rV \quad (22)$$

- At $P = p_{\max}$ it is assumed that the value of the project will be linear in the oil price, implying $\frac{\partial^2 V}{\partial p^2} = 0$. The implicit assumption is that volatility is unimportant at very high prices and is commonly assumed in the finance literature (Wilmott 1998). In this case the differential operator becomes:

$$\mathcal{L}V = a \frac{\partial V}{\partial P} - Q \frac{\partial V}{\partial S} + (W_w - W_p) \frac{\partial V}{\partial I} + \sum_{u=1, u \neq k}^3 \lambda^{k \rightarrow u} (V(\bar{w} = \bar{W}_u) - V(\bar{w} = \bar{W}_k)) - rV \quad (23)$$

where $a \equiv \epsilon(\mu - \ln P)P$; and $b \equiv \sigma P$.

917 Since $a = \epsilon(\mu - \ln P)P \leq 0$, according to the discussion of boundary conditions by
918 Chen & Forsyth (2007), characteristics are outgoing in the P direction at $P \rightarrow p_{\max}$.

Hence no additional information is needed from outside of the domain of P and we can solve the PDE at the boundary.²⁶

- As $S \rightarrow 0$, the oil production converges to zero: $Q \rightarrow 0$. At this point, the project ends, and the land must be reclaimed according to regulations.
- At $S = s_0$, we solve the HJB equation at this boundary, and no special boundary condition is needed.
- As $I = 0$, we can not withdraw water from the storage facility, but can only add water into the facility through water withdrawals from the river. Hence $(W_w - W_p) \geq 0$. Accordingly there are outgoing characteristics in the I direction. We do not need additional information from outside of the domain of I and can just solve the HJB equation along the boundary.
- When $I = I^{\max}$, we cannot add any additional water to storage which means $(W_w - W_p) \leq 0$. Hence there are outgoing characteristics in the I direction. No additional information is needed from outside of the domain of I .

B Online appendix: Figures and tables for the pessimistic price sensitivity

Recall the assumed oil price model is $dP = \epsilon(\mu - \ln P(t))P(t)dt + \sigma P(t)dz$. In the base case $\epsilon = 0.14$, $\mu = 4.59$ and $\sigma = 0.31$. For the pessimistic oil price sensitivity, the long run mean log oil price is reduced to $\mu = 3.69$. The below tables and figures show the results for this pessimistic price sensitivity and are directly comparable to the tables and figures presented for the base case in the main text.

²⁶A detailed discussion about the information propagation direction along characteristics can be found in Strikwerda (2004).

$P(t = 0)$, US\$/bbl	W_L	W_S	% difference	D_L	D_S	% difference
\$40	5636	5428	-7.1%	5567	4894	-12.9%
\$100	14,699	14,240	-3.2%	14,562	13,198	-9.8%

Table 10: Sample project values at time zero, pessimistic price sensitivity, highlighting comparison of strict and lenient scenarios, storage option not available. \$US (millions), Scenarios are defined in Table 6

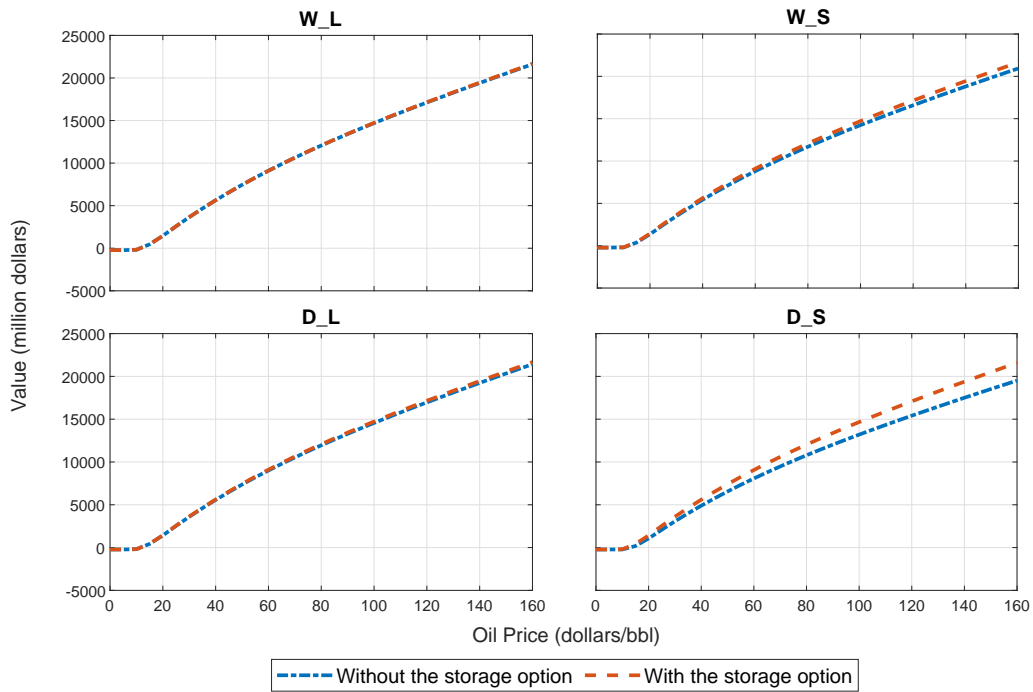


Figure 13: Pessimistic price sensitivity: Comparing the project values, US \$, at time zero in different scenarios with and without the option to install a water storage facility; resource stock level is 880 million barrels, the river flow condition is in the red zone

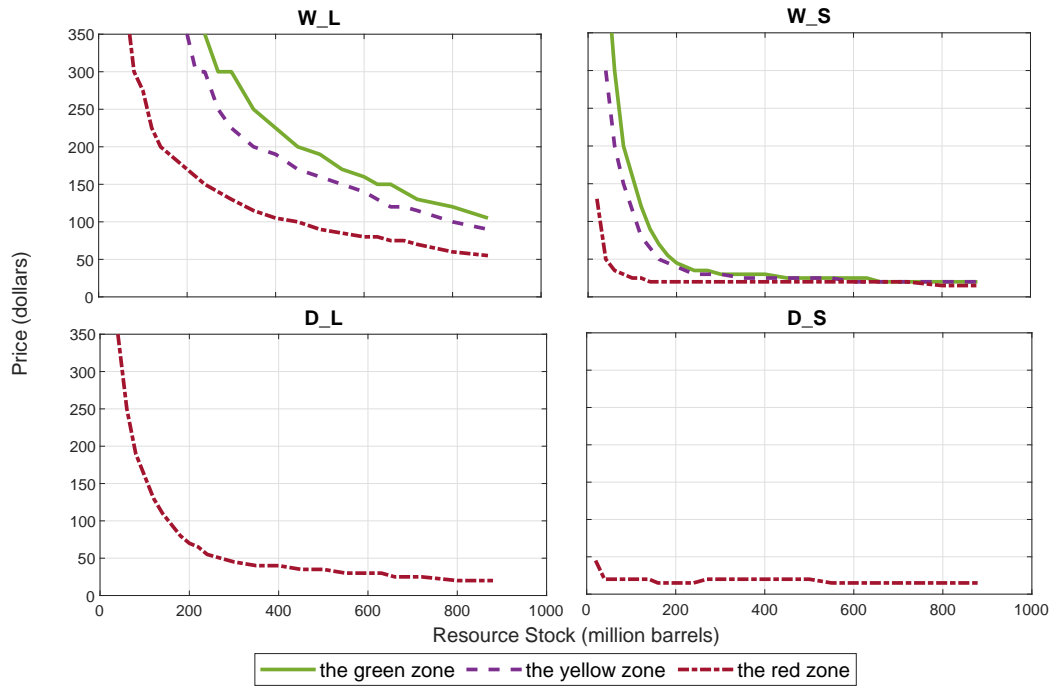
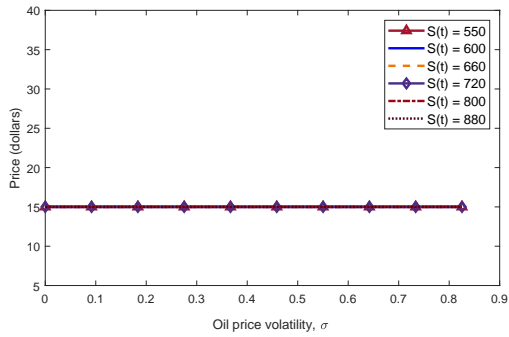


Figure 14: Pessimistic price sensitivity: Critical prices (US \$/bbl) to proceed from operating stage 1 (operating, no storage) to stage 3 (operating, with storage) at time zero for different resource stock levels in the four scenarios

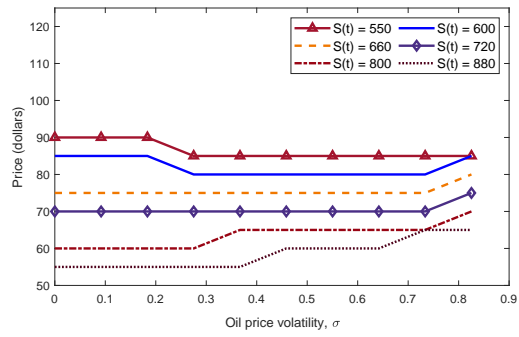
Table 11: Pessimistic Price Sensitivity: Critical Prices To Abandon The Project While There Is No Option To Install Water Storage To Mitigate (\$/barrel), Pessimistic Price Sensitivity

From suspended stage (Stage 2) to abandonment, (Stage 5)								
Resource stock (million barrels)	W_L			W_S			D_L	D_S
	green	yellow	red	green	yellow	red	red	red
	stage 2→5	stage 2→5	stage 2→5	stage 2→5	stage 2→5	stage 2→5	stage 2→5	stage 2→5
0	H	H	H	H	H	H	H	H
20	20	20	20	20	20	20	20	25
40	20	20	20	20	20	20	20	20
60	20	20	20	20	20	20	20	20
80	20	20	20	20	20	20	20	20
120	15	15	15	15	15	20	15	20
140	15	15	15	15	15	20	15	20
180	15	15	15	15	15	15	15	15
200	15	15	15	15	15	15	15	15
240	15	15	15	15	15	15	15	15
300	15	15	15	15	15	15	15	15
350	15	15	15	15	15	15	15	15
450	10	10	10	10	10	10	10	10
500	10	10	10	10	10	10	10	10
600	10	10	10	10	10	10	10	10
660	10	10	10	10	10	10	10	10
720	5	5	5	5	5	5	5	10
800	5	5	5	5	5	5	5	10
880	5	5	5	5	5	5	5	10

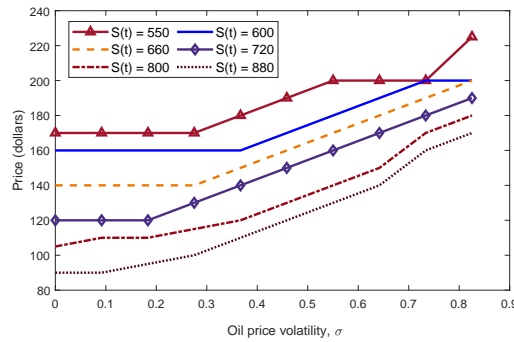
Note: 'H' refers to a very large number implying it is always optimal to abandon the project when the resource stock is 0.



(a) D_S in the red zone



(b) W_L in the red zone



(c) W_L in the green zone

Figure 15: Pessimistic price sensitivity: Critical prices in US\$/bbl to install storage versus volatility for different scenarios in the red and green zones.