#### BOARD OF TRADE OF THE CITY OF CHICAGO INC.

# ANALYSIS OF DELIVERABLE SUPPLY SOYBEAN OIL FUTURES

#### **AUGUST 2018**

In estimating deliverable supply for the Soybean Oil Futures, the Board of Trade of the City of Chicago Inc. ("CBOT" or "Exchange") relied on long-standing precedent, which provides that the key component in estimating deliverable supply is the portion of typical production and supply stocks that could reasonably be considered to be readily available for delivery. In its guidance on estimating deliverable supply, the Commodity Futures Trading Commission ("CFTC" or "Commission") states:

In general, the term "deliverable supply" means the quantity of the commodity meeting a derivative contract's delivery specifications that can reasonably be expected to be readily available to short traders and saleable by long traders at its market value in normal cash marketing channels at the derivative contract's delivery points during the specified delivery period, barring abnormal movement in interstate commerce. Typically, deliverable supply reflects the quantity of the commodity that potentially could be made available for sale on a spot basis at current prices at the contract's delivery points. For a non-financial physical-delivery commodity contract, this estimate might represent product which is in storage at the delivery point(s) specified in the futures contract or can be moved economically into or through such points consistent with the delivery procedures set forth in the contract and which is available for sale on a spot basis within the marketing channels that normally are tributary to the delivery point(s).<sup>1</sup>

## Background:

Soybean oil is a bi-product created from crushing soybeans and is a widely consumed vegetable oil and is also used extensively in the production of ink and paint. The USDA estimates 2017/18 soybean oil production at 10.657 million metric tons, a 6.2 percent increase from 2016/17.

### **Delivery Capacity:**

The CBOT Soybean Oil futures contract calls for the delivery of 60,000 pounds of crude soybean oil. Most soybean oil produced in U.S. soybean processing facilities is eligible for delivery on CBOT Soybean Oil futures contracts. The Soybean Oil futures contract requires delivered crude soybean oil meet the following specifications:

- (a) It shall be one of the following types: Expeller pressed, expeller pressed degummed, solvent extracted, or solvent extracted degummed. Mixtures of one type with any other is not deliverable;
- (b) It shall contain no more than 0.3% moisture and volatile content;
- (c) It shall be lighter in green color than Standard "A" and when refined and bleached shall produce a refined and bleached oil of not deeper color than 3.5 red on the Lovibond scale:
- (d) It shall refine with a loss not exceeding 5% as determined by the "neutral oil" method;
- (e) It shall have a flash point not below 250 degrees Fahrenheit, closed cup method;
- (f) It shall contain no more than 1.5% unsaponifiable matter (exclusive of moisture and volatile matter).

No lower grades are deliverable. Higher grades may be delivered at contract price except when the refining loss is less than 5% as determined by the "neutral oil" method, a premium of one percent of the cash market price at the time of loading is paid for each one percent under the 5% loss (fractions figured throughout) with a maximum credit of  $4\frac{1}{2}$ %.

When a bushel of soybeans weighing 60 pounds is crushed, the conventional result is 11 pounds of soybean oil, 44 pounds of soybean meal, 4 pounds of hulls, and 1 pound of waste.

<sup>&</sup>lt;sup>1</sup> http://www.ecfr.gov/cgi-bin/text-idx?SID=74959c3dbae469e2efe0a42b45b8dfae&mc=true&node=ap17.1.38\_11201.c&rgn=div9

The Soybean Oil futures contract has six delivery territories consisting of:

- (a) Illinois Territory (That portion of the state of Illinois north of latitude 38°00' N.)
- (b) Eastern Territory (Those portions of the states of Indiana and Kentucky west of the Ohio-Indiana border and its extension and north of latitude 38°00'N.)
- (c) Eastern lowa Territory (That portion of the state of lowa east of longitude 93°50'W.)
- (d) Southwest Territory (Those portions of the states of Missouri and Kansas north of latitude 38°00'N. and east of longitude 97°00'W.)
- (e) Western Territory (Those portions of the states of Iowa west of longitude 93°50'W., and Nebraska east of longitude 97°00'W.)
- (f) Northern Territory (Those portions of the states of Minnesota south of latitude 45°10'N., and South Dakota south of latitude 45°10'N., and east of 97°00'W.)

Soybean oil is a very storable commodity, and the amount of soybean oil the Exchange allows registered delivery facilities to deliver (regular capacity) is based on the lesser of each facility's approved storage space or 20 times their registered daily rate for loading jumbo tank cars. Below are the facilities regular for delivery on CBOT Soybean Oil futures and the maximum number of warehouse receipts each facility may deliver:

| FIRM/FACILITIES                    | REGULAR SPACE (POUNDS) | MAXIMUM WAREHOUSE<br>RECEIPTS ALLOWED TO |
|------------------------------------|------------------------|--|
|                                    |                        | ISSUE                                    |
| AG PROCESSING,                     |                        |  |
| INCORPORATED                       |                        |  |
| Dawson, MN                         | 24,000,000             | 334                                      |
| Eagle Grove, IA                    | 20,000,000             | 333                                      |
| Emmetsburg, IA                     | 88,000,000             | 1,466                                    |
| Manning, IA                        | 9,000,000              | 150                                      |
| Mason City, IA                     | 36,000,000             | 600                                      |
| Omaha, NE                          | 40,000,000             | 666                                      |
| Sergeant Bluff, IA                 | 21,000,000             | 350                                      |
| Sheldon, IA                        | 19,200,000             | 320                                      |
| St. Joseph, MO                     | 24,000,000             | 400                                      |
| ARCHER DANIELS MIDLAND             |                        |  |
| CO                                 |                        |  |
| Decatur, IL                        | 118,400,000            | 1,973                                    |
| Des Moines, IA                     | 44,421,696             | 740                                      |
| Frankfurt, IN                      | 25,900,000             | 431                                      |
| Lincoln, NE                        | 63,600,000             | 1,060                                    |
| Mexico, MO                         | 29,600,000             | 493                                      |
| Quincy, IL                         | 48,400,000             | 816                                      |
| Mankato, MN                        | 37,020,000             | 616                                      |
| BUNGE NORTH AMERICA<br>(EAST), LLC |                        |  |
| Decatur, IN                        | 118,950,000            | 1,333                                    |
| BUNGE NORTH AMERICA                | 110,930,000            | 1,555                                    |
| (ODP WEST), INC                    |                        |  |
| Emporia, KS                        | 36,600,000             | 416                                      |
| CARGILL, INC.                      |                        |  |
| Ackley, IA                         | 190,000,000            | 3,166                                    |
| Bloomington, IL                    | 3,900,000              | 65                                       |
| Cedar Rapids, IA                   | 1,920,000              | 32                                       |
| Cedar Rapids, (E), IA              | 9,300,000              | 155                                      |
| Iowa Falls, IA                     | 20,000,000             | 233                                      |
| Kansas City, MO                    | 10,364,000             | 172                                      |
| Lafayette, IN                      | 9,000,000              | 150                                      |

| FIRM/FACILITIES                         | REGULAR SPACE (POUNDS) | MAXIMUM WAREHOUSE<br>RECEIPTS ALLOWED TO<br>ISSUE |
|---|------------------------|---|
| Creve Coeur, IL                         | 50,000,000             | 833   |
| Camanche, IA                            | 44,500,000             | 498   |
| CHS Inc.                                |                        |   |
| Mankato, MN                             | 14,600,000             | 243   |
| INCOBRASA INDUSTRIES,<br>LLC            |                        |   |
| Gilman, IL                              | 23,000,000             | 383   |
| LOUIS DREYFUS CLAYPOOL<br>HOLDINGS, LLC |                        |   |
| Claypool, IN                            | 30,000,000             | 370   |
| MINNESOTA SOYBEAN PROCESSORS            |                        |   |
| Brewster, MN                            | 88,800,000             | 1,480   |
| SOLAE LLC                               |                        |   |
| Gibson City, IL                         | 45,600,000             | 760   |
| SOUTH DAKOTA SOYBEAN PROCESSORS, LLC    |                        |   |
| Volga, SD                               | 200,700,000            | 3,316   |
| ZEELAND FARM SERVICES, INC              |                        |   |
| Portage, IN                             | 21,000,000             | 350   |
| TOTALS                                  | 1,566,775,696          | 24,703  |

As of August 2018, the CBOT Soybean Oil futures contract has over 1.566 billion pounds of approved regular storage capacity and firms may deliver up to 24,703 warehouse receipts.

#### **Deliverable Supply:**

The U.S. Census Bureau collected, and the USDA published monthly soybean oil production estimates for the U.S. until September 2011 when the *Oilseed Crushings* report was discontinued. The National Oilseed Processors Association (NOPA) continues to publish monthly soybean oil production and storage for its member firms. A list of processing plants included in the NOPA Statistical crush report is available here:

http://www.nopa.org/oilseed-processing/nopa-plant-locations/

Also, here is the link for information about the NOPA monthly statistical crush report on Thomson Reuters: <a href="http://commoditiesupdates.thomsonreuters.com/nopa/">http://commoditiesupdates.thomsonreuters.com/nopa/</a>

NOPA reports soybean oil production and stocks for 58 processing plants. Of these 58 plants, 26 of them are regular for delivering on Soybean Oil futures. Additionally, there are 8 plants that are regular for futures delivery but not part of the NOPA Statistical crush report.

NOPA production and stocks reports are broken down into the following six regions:

- Illinois
- Pennsylvania, Indiana, Kentucky, Ohio, Michigan
- Southeast
- Southwest
- lowa
- Minnesota, North Dakota, South Dakota, Montana

| NOPA Territory  | Number of NOPA<br>Reporting Plants | Number of NOPA Plants that are Regular for Delivery | Percentage of NOPA Plants that are Regular for Delivery |
|---|------------------------------------|---|---|
| Illinois  | 7                                  | 4   | 57%   |
| Pennsylvania, Indiana,<br>Kentucky, Ohio,<br>Michigan | 13                                 | 4   | 31%   |
| Southeast   | 10                                 | 0   | 0%  |
| Southwest   | 12                                 | 5   | 42%   |
| Iowa  | 12                                 | 10  | 83%   |
| Minnesota, North<br>Dakota, South Dakota,<br>Montana  | 4                                  | 3   | 75%   |
| TOTAL   | 58                                 | 26  | 45%   |

Deliverable supply is estimated based on NOPA reported soybean oil stocks in each of their territories during the month prior to each futures contract delivery. These values are then weighted by the percentage of NOPA member processing plants that are also regular for delivery on CBOT Soybean Oil futures to estimate futures deliverable supply<sup>i</sup>.

December 2015-2017 (November 2015-2017 Stocks)

| NOPA Territory     | NOPA Stocks<br>(1,000 lbs) | Weighting | Estimated<br>Deliverable Supply<br>(1,000 lbs) |
|--------------------|----------------------------|-----------|--|
| Nov-15             |                            |           |  |
| Illinois           | 246,028                    | 57%       | 140,236  |
| PA, IN, KY, OH, MI | 298,660                    | 31%       | 92,585   |
| Southeast          | 123,909                    | 0%        | 0  |
| Southwest          | 412,847                    | 42%       | 173,396  |
| Iowa               | 306,442                    | 83%       | 254,347  |
| MN, ND, SD, MT     | 83,103                     | 75%       | 62,327   |
| ESTIMATED          |                            |           | 722,890  |
| DELIVERABLE        |                            |           |  |
| SUPPLY 2015        |                            | Contracts | 12,048   |
| Nov-16             |                            |           |  |
| Illinois           | 249,760                    | 57%       | 142,363  |
| PA, IN, KY, OH, MI | 307,734                    | 31%       | 95,398   |
| Southeast          | 114,594                    | 0%        | 0  |
| Southwest          | 289,626                    | 42%       | 121,643  |
| lowa               | 335,697                    | 83%       | 278,629  |
| MN, ND, SD, MT     | 41,230                     | 75%       | 30,923   |
| ESTIMATED          |                            |           | 668,955  |

| DELIVERABLE        |         |           |         |
|--------------------|---------|-----------|---------|
| SUPPLY 2016        |         | Contracts | 11,149  |
|                    |         |           |         |
| Nov-17             |         |           |         |
| Illinois           | 246,635 | 57%       | 140,582 |
| PA, IN, KY, OH, MI | 316,167 | 31%       | 98,012  |
| Southeast          | 148,169 | 0%        | 0       |
| Southwest          | 213,698 | 42%       | 89,753  |
| lowa               | 321,932 | 83%       | 267,204 |
| MN, ND, SD, MT     | 79,702  | 75%       | 59,777  |
| ESTIMATED          |         |           | 655,327 |
| DELIVERABLE        |         |           |         |
| SUPPLY 2017        |         | Contracts | 10,922  |
|                    |         |           |         |
| ESTIMATED          |         |           | 682,391 |
| DELIVERABLE        |         |           |         |
| SUPPLY 2015-2017   |         | Contracts | 11,373  |

January 2016-2018 (December 2015-2017 Stocks)

| NOPA Territory     | NOPA Stocks<br>(1,000 lbs) | Weighting | Estimated<br>Deliverable Supply<br>(1,000 lbs) |
|--------------------|----------------------------|-----------|--|
| Dec-15             | •                          |           |  |
| Illinois           | 258,636                    | 57%       | 147,423  |
| PA, IN, KY, OH, MI | 310,119                    | 31%       | 96,137   |
| Southeast          | 124,364                    | 0%        | 0  |
| Southwest          | 378,669                    | 42%       | 159,041  |
| Iowa               | 299,626                    | 83%       | 248,690  |
| MN, ND, SD, MT     | 109,671                    | 75%       | 82,253   |
| ESTIMATED          |                            |           | 733,543  |
| DELIVERABLE        |                            |           |  |
| SUPPLY 2015        |                            | Contracts | 12,226   |
|                    |                            |           |  |
| Dec-16             |                            |           |  |
| Illinois           | 265,532                    | 57%       | 151,353  |

| PA, IN, KY, OH, MI | 295,152 | 31%       | 91,497  |
|--------------------|---------|-----------|---------|
| Southeast          | 139,015 | 0%        | 0       |
| Southwest          | 367,635 | 42%       | 154,407 |
| lowa               | 321,563 | 83%       | 266,897 |
| MN, ND, SD, MT     | 45,049  | 75%       | 33,787  |
| ESTIMATED          |         |           | 697,941 |
| DELIVERABLE        |         |           |         |
| SUPPLY 2016        |         | Contracts | 11,632  |
|                    |         |           |         |
| Dec-17             |         |           |         |
| Illinois           | 266,659 | 57%       | 151,996 |
| PA, IN, KY, OH, MI | 344,890 | 31%       | 106,916 |
| Southeast          | 157,929 | 0%        | 0       |
| Southwest          | 271,596 | 42%       | 114,070 |
| Iowa               | 379,567 | 83%       | 315,041 |
| MN, ND, SD, MT     | 97,531  | 75%       | 73,148  |
| ESTIMATED          |         |           | 761,171 |
| DELIVERABLE        |         |           |         |
| SUPPLY 2017        |         | Contracts | 12,686  |
|                    |         |           |         |
| ESTIMATED          |         |           | 730,885 |
| DELIVERABLE        |         |           |         |
| SUPPLY 2015-2017   |         | Contracts | 12,181  |

March 2015-2017 (February 2015-2017 Stocks)

| NOPA Territory     | NOPA Stocks<br>(1,000 lbs) | Weighting | Estimated Deliverable Supply (1,000 lbs) |
|--------------------|----------------------------|-----------|--|
| Feb-15             |                            |           |  |
| Illinois           | 332,873                    | 57%       | 189,738                                  |
| PA, IN, KY, OH, MI | 234,921                    | 31%       | 72,826                                   |
| Southeast          | 115,391                    | 0%        | 0  |
| Southwest          | 248,270                    | 42%       | 104,273                                  |
| lowa               | 302,706                    | 83%       | 251,246                                  |
| MN, ND, SD, MT     | 87,894                     | 75%       | 65,921                                   |

| ESTIMATED             |         |           | 684,003 |
|-----------------------|---------|-----------|---------|
| DELIVERABLE           |         |           |         |
| SUPPLY 2015           |         | Contracts | 11,400  |
|                       |         |           |         |
| Feb-16                |         |           |         |
| Illinois              | 343,309 | 57%       | 195,686 |
| PA, IN, KY, OH, MI    | 424,613 | 31%       | 131,630 |
| Southeast             | 142,667 | 0%        | 0       |
| Southwest             | 347,159 | 42%       | 145,807 |
| lowa                  | 396,139 | 83%       | 328,795 |
| MN, ND, SD, MT        | 138,165 | 75%       | 103,624 |
| ESTIMATED             |         |           | 905,542 |
| DELIVERABLE           |         |           |         |
| SUPPLY 2016           |         | Contracts | 15,092  |
|                       |         |           |         |
| Feb-17                |         |           |         |
| Illinois              | 303,279 | 57%       | 172,869 |
| PA, IN, KY, OH, MI    | 326,366 | 31%       | 101,173 |
| Southeast             | 185,524 | 0%        | 0       |
| Southwest             | 396,799 | 42%       | 166,656 |
| lowa                  | 463,267 | 83%       | 384,512 |
| MN, ND, SD, MT        | 94,824  | 75%       | 71,118  |
| ESTIMATED             |         |           | 896,328 |
| DELIVERABLE           |         |           |         |
| SUPPLY 2017           |         | Contracts | 14,939  |
|                       |         |           |         |
| ESTIMATED DELIVERABLE |         |           | 828,624 |
| SUPPLY 2015-2017      |         | Contracts | 13,810  |

May 2015-2017(April 2015-2017 Stocks)

| NOPA Territory | NOPA Stocks<br>(1,000 lbs) | Weighting | Estimated Deliverable Supply (1,000 lbs) |
|----------------|----------------------------|-----------|--|
| Apr-15         |                            |           |  |
| Illinois       | 345,591                    | 57%       | 196,987                                  |

| PA, IN, KY, OH, MI           | 306,637 | 31%       | 95,057  |
|------------------------------|---------|-----------|---------|
| Southeast                    | 96,919  | 0%        | 0       |
| Southwest                    | 277,478 | 42%       | 116,541 |
| Iowa                         | 331,383 | 83%       | 275,048 |
| MN, ND, SD, MT               | 82,977  | 75%       | 62,233  |
| ESTIMATED                    |         |           | 745,866 |
| DELIVERABLE                  |         |           |         |
| SUPPLY 2015                  |         | Contracts | 12,431  |
| Apr-16                       |         |           |         |
| Illinois                     | 386,801 | 57%       | 220,477 |
| PA, IN, KY, OH, MI           | 505,215 | 31%       | 156,617 |
| Southeast                    | 116,604 | 0%        | 0       |
| Southwest                    | 395,992 | 42%       | 166,317 |
| Iowa                         | 424,880 | 83%       | 352,650 |
| MN, ND, SD, MT               | 113,237 | 75%       | 84,928  |
| ESTIMATED                    |         |           | 980,988 |
| DELIVERABLE                  |         |           | ·       |
| SUPPLY 2016                  |         | Contracts | 16,350  |
| Apr-17                       |         |           |         |
| Illinois                     | 378,119 | 57%       | 215,528 |
| PA, IN, KY, OH, MI           | 367,787 | 31%       | 114,014 |
| Southeast                    | 130,366 | 0%        | 0       |
| Southwest                    | 262,579 | 42%       | 110,283 |
| Iowa                         | 496,942 | 83%       | 412,462 |
| MN, ND, SD, MT               | 89,610  | 75%       | 67,208  |
| ESTIMATED                    |         |           | 919,494 |
| DELIVERABLE                  |         |           |         |
| SUPPLY 2017                  |         | Contracts | 15,325  |
| ESTIMATED                    |         |           | 882,116 |
| DELIVERABLE SUPPLY 2015-2017 |         | Contracts | 14,702  |

July 2015-2017 (June 2015-2017 Stocks)

| July 2015-2017 (June 2015-2017 Stocks)  NOPA Territory | NOPA Stocks<br>(1,000 lbs) | Weighting | Estimated Deliverable Supply (1,000 lbs) |
|--|----------------------------|-----------|--|
| Jun-15   |                            |           |  |
| Illinois   | 364,650                    | 57%       | 207,851                                  |
| PA, IN, KY, OH, MI                                     | 319,505                    | 31%       | 99,047                                   |
| Southeast  | 115,853                    | 0%        | 0  |
| Southwest  | 309,739                    | 42%       | 130,090                                  |
| lowa   | 391,795                    | 83%       | 325,190                                  |
| MN, ND, SD, MT   | 72,384                     | 75%       | 54,288                                   |
| ESTIMATED  |                            |           | 816,465                                  |
| DELIVERABLE  |                            |           |  |
| SUPPLY 2015  |                            | Contracts | 13,608                                   |
|  |                            |           |  |
| Jun-16   |                            |           | T  |
| Illinois   | 325,336                    | 57%       | 185,442                                  |
| PA, IN, KY, OH, MI                                     | 500,865                    | 31%       | 155,268                                  |
| Southeast  | 161,220                    | 0%        | 0  |
| Southwest  | 442,667                    | 42%       | 185,920                                  |
| lowa   | 476,338                    | 83%       | 395,361                                  |
| MN, ND, SD, MT   | 78,549                     | 75%       | 58,912                                   |
| ESTIMATED  |                            |           | 980,902                                  |
| DELIVERABLE  |                            |           |  |
| SUPPLY 2016  |                            | Contracts | 16,348                                   |
|  |                            |           |  |
| Jun-17   |                            |           | <b>T</b>                                 |
| Illinois   | 362,630                    | 57%       | 206,699                                  |
| PA, IN, KY, OH, MI                                     | 369,692                    | 31%       | 114,605                                  |
| Southeast  | 98,315                     | 0%        | 0  |
| Southwest  | 304,772                    | 42%       | 128,004                                  |
| lowa   | 477,519                    | 83%       | 396,341                                  |
| MN, ND, SD, MT   | 90,478                     | 75%       | 67,859                                   |
| ESTIMATED  |                            |           | 913,507                                  |

| DELIVERABLE      |           |         |
|------------------|-----------|---------|
| SUPPLY 2017      | Contracts | 15,225  |
|                  |           |         |
| ESTIMATED        |           | 903,625 |
| DELIVERABLE      |           |         |
| SUPPLY 2015-2017 | Contracts | 15,060  |

August 2015-2017 (July 2015-2017 Stocks)

| NOPA Territory        | NOPA Stocks<br>(1,000 lbs) | Weighting | Estimated Deliverable Supply (1,000 lbs) |
|-----------------------|----------------------------|-----------|--|
| Jul-15                |                            |           |  |
| Illinois              | 338,228                    | 57%       | 192,790                                  |
| PA, IN, KY, OH, MI    | 307,799                    | 31%       | 95,418                                   |
| Southeast             | 135,681                    | 0%        | 0  |
| Southwest             | 351,186                    | 42%       | 147,498                                  |
| lowa                  | 408,112                    | 83%       | 338,733                                  |
| MN, ND, SD, MT        | 83,306                     | 75%       | 62,480                                   |
| ESTIMATED DELIVERABLE |                            |           | 836,918                                  |
| SUPPLY 2015           |                            | Contracts | 13,949                                   |
| Jul-16                |                            |           |  |
| Illinois              | 278,806                    | 57%       | 158,919                                  |
| PA, IN, KY, OH, MI    | 489,166                    | 31%       | 151,641                                  |
| Southeast             | 56,351                     | 0%        | 0  |
| Southwest             | 401,393                    | 42%       | 168,585                                  |
| lowa                  | 459,001                    | 83%       | 380,971                                  |
| MN, ND, SD, MT        | 58,467                     | 75%       | 43,850                                   |
| ESTIMATED             |                            |           | 903,967                                  |
| DELIVERABLE           |                            |           |  |
| SUPPLY 2016           |                            | Contracts | 15,066                                   |
| Jul-17                |                            |           |  |
| Illinois              | 362,620                    | 57%       | 206,693                                  |

| PA, IN, KY, OH, MI | 325,958 | 31%       | 101,047 |
|--------------------|---------|-----------|---------|
| Southeast          | 104,301 | 0%        | 0       |
| Southwest          | 232,830 | 42%       | 97,789  |
| Iowa               | 435,395 | 83%       | 361,378 |
| MN, ND, SD, MT     | 96,748  | 75%       | 72,561  |
| ESTIMATED          |         |           | 839,468 |
| DELIVERABLE        |         |           |         |
| SUPPLY 2017        |         | Contracts | 13,991  |
|                    |         |           |         |
| ESTIMATED          |         |           | 860,118 |
| DELIVERABLE        |         |           |         |
| SUPPLY 2015-2017   |         | Contracts | 14,335  |

September 2015-2017 (August 2015-2017 Stocks)

| NOPA Territory     | NOPA Stocks<br>(1,000 lbs) | Weighting | Estimated Deliverable Supply (1,000 lbs) |
|--------------------|----------------------------|-----------|--|
| Aug-15             |                            |           |  |
| Illinois           | 332,055                    | 57%       | 189,271                                  |
| PA, IN, KY, OH, MI | 285,955                    | 31%       | 88,646                                   |
| Southeast          | 111,026                    | 0%        | 0  |
| Southwest          | 282,965                    | 42%       | 118,845                                  |
| lowa               | 375,674                    | 83%       | 311,809                                  |
| MN, ND, SD, MT     | 92,495                     | 75%       | 69,371                                   |
| ESTIMATED          |                            |           | 777,943                                  |
| DELIVERABLE        |                            |           |  |
| SUPPLY 2015        |                            | Contracts | 12,966                                   |
| Aug-16             |                            |           |  |
| Illinois           | 251,513                    | 57%       | 143,362                                  |
| PA, IN, KY, OH, MI | 411,384                    | 31%       | 127,529                                  |
| Southeast          | 74,285                     | 0%        | 0  |
| Southwest          | 400,803                    | 42%       | 168,337                                  |
| lowa               | 436,294                    | 83%       | 362,124                                  |
| MN, ND, SD, MT     | 46,000                     | 75%       | 34,500                                   |

| ESTIMATED          |         |           | 835,853 |
|--------------------|---------|-----------|---------|
| DELIVERABLE        |         |           |         |
| SUPPLY 2016        |         | Contracts | 13,931  |
|                    |         |           |         |
| Aug-17             |         |           |         |
| Illinois           | 297,384 | 57%       | 169,509 |
| PA, IN, KY, OH, MI | 299,709 | 31%       | 92,910  |
| Southeast          | 102,061 | 0%        | 0       |
| Southwest          | 279,833 | 42%       | 117,530 |
| Iowa               | 366,922 | 83%       | 304,545 |
| MN, ND, SD, MT     | 71,106  | 75%       | 53,330  |
| ESTIMATED          |         |           | 737,823 |
| DELIVERABLE        |         |           |         |
| SUPPLY 2017        |         | Contracts | 12,297  |
|                    |         |           |         |
| ESTIMATED          |         |           | 783,873 |
| DELIVERABLE        |         |           |         |
| SUPPLY 2015-2017   |         | Contracts | 13,065  |

October 2015-2017 (September 2015-2017 Stocks)

| NOPA Territory     | NOPA Stocks<br>(1,000 lbs) | Weighting | Estimated Deliverable Supply (1,000 lbs) |
|--------------------|----------------------------|-----------|--|
| Sep-15             | •                          |           |  |
| Illinois           | 290,260                    | 57%       | 165,448                                  |
| PA, IN, KY, OH, MI | 277,906                    | 31%       | 86,151                                   |
| Southeast          | 101,409                    | 0%        | 0  |
| Southwest          | 304,430                    | 42%       | 127,861                                  |
| Iowa               | 304,767                    | 83%       | 252,957                                  |
| MN, ND, SD, MT     | 75,931                     | 75%       | 56,948                                   |
| ESTIMATED          |                            |           | 689,365                                  |
| DELIVERABLE        |                            |           |  |
| SUPPLY 2015        |                            | Contracts | 11,489                                   |
|                    |                            |           |  |
| Sep-16             |                            |           |  |
| Illinois           | 185,512                    | 57%       | 105,742                                  |

| PA, IN, KY, OH, MI | 354,697 | 31%       | 109,956 |
|--------------------|---------|-----------|---------|
| Southeast          | 111,792 | 0%        | 0       |
| Southwest          | 290,115 | 42%       | 121,848 |
| Iowa               | 381,959 | 83%       | 317,026 |
| MN, ND, SD, MT     | 51,878  | 75%       | 38,909  |
| ESTIMATED          |         |           | 693,481 |
| DELIVERABLE        |         |           |         |
| SUPPLY 2016        |         | Contracts | 11,558  |
|                    |         |           |         |
| Sep-17             |         | <u> </u>  |         |
| Illinois           | 261,029 | 57%       | 148,787 |
| PA, IN, KY, OH, MI | 322,552 | 31%       | 99,991  |
| Southeast          | 103,052 | 0%        | 0       |
| Southwest          | 227,634 | 42%       | 95,606  |
| Iowa               | 311,397 | 83%       | 258,460 |
| MN, ND, SD, MT     | 76,248  | 75%       | 57,186  |
| ESTIMATED          |         |           | 660,029 |
| DELIVERABLE        |         |           |         |
| SUPPLY 2017        |         | Contracts | 11,000  |
|                    |         |           |         |
| ESTIMATED          |         |           | 680,958 |
| DELIVERABLE        |         |           |         |
| SUPPLY 2015-2017   |         | Contracts | 11,349  |

#### Seasonality:

The Exchange continuously monitors the deliverable supply and the delivery requirements on the Contract. Further, the Exchange closely monitors seasonality and to the extent that the Exchange anticipates that 25 percent of any contract month's deliverable supply would fall below the current spot month limit, the Exchange would make a good faith effort to resolve conditions potentially limiting the adequacy of the deliverable supply or evaluate whether there is a need to adjust the spot-month position limit for that corresponding contract month.

# **Long Term Contracts:**

There is no readily available data on soybean oil under long-term contracts or agreements that could not be delivered on futures and should not be counted in deliverable supply estimates. To gauge the potential impact of long-term contracts, the Exchange conducted outreach to three regular warehousemen. Feedback from these three warehousemen suggests long-term agreements should not affect deliverable soybean oil stocks should it become economical to deliver against futures. The organization of the soybean crush market makes it unlikely much if any oil would ever be contracted under long-term agreements.

Soybeans are typically crushed for meal rather than oil, and the U.S. historically carries significant quantities of oil in store. Buyers typically enter long-term agreements when they have concerns about meeting their use needs, which rarely if ever happens with soybean oil.

#### **ANALYSIS OF DELIVERABLE SUPPLY**

Most although not all NOPA member soybean oil stocks data would meet CBOT Soybean Oil futures specifications. Unfortunately, NOPA does not distinguish among quality attributes in its monthly statistics. Thus, the Exchange does not try to account for stocks that may not meet Exchange quality specifications. However, this is likely a very conservative estimate because, although stocks not meeting specifications are not subtracted, none of the significant stocks produced and/or stored at plants and storage facilities regular for delivery on Soybean Oil futures that are not NOPA member processing plants are counted.

Based on the above analysis, the Exchange estimates the monthly deliverable supply over the past three years to be approximately 794 million pounds or **13,235** contract equivalents (contract size: 60,000 pounds). The current spot month limit of 540 represents **4.1%** of this estimated monthly deliverable supply.

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<sup>&</sup>lt;sup>1</sup> The crushing capacity of plants is proprietary data. In aggregate, however, on 1 January 2018, regular firms had a 30-day crushing capacity of 92,145,000 bushels of soybeans. Without knowing the crushing capacity of NOPA members that are not also regular for delivery on Soybean Oil futures, total NOPA crush capacity has to be estimated. From December 2015 to current, the maximum NOPA crush was during March 2018 when NOPA member firms crushed 171,858,000 bushels of soybeans. Assuming this maximum NOPA crush is near 100 percent of NOPA capacity, Soybean Oil regular firms have crushing capacity that is 57 percent of NOPA capacity despite being only 26/58 = 45 percent of NOPA member firms, which suggests plants regular for delivery on Soybean Oil futures are, on average, larger than the average NOPA reporting plant. The current Deliverable Supply estimate based on regular firms that are also NOPA members uses 45 percent of NOPA reported stocks (i.e., the estimate DOES NOT count the eight regular firms that are not NOPA members). Thus, the Deliverable Supply estimate is likely a very conservative estimate.