

P R E L I M I N A R Y P R O G R A M

Agenda Subject to Change. All Times are Central Time.

Thursday, September 23rd, 2021

- 8:30 am - 9:40 am **IRS Update**
David Blair – Crowell & Moring
David Fischer – Crowell & Moring
- 9:40 am - 10:50 am **Litigation Update**
Kevin Kenworthy – Miller & Chevalier
Loren Ponds – Miller & Chevalier
- 10:50 am - 11:00 am **BREAK**
- 11:00 am - 12:00 pm **Washington Update**
Jon Traub – Deloitte
- 12:00 pm – 1:15 pm **LUNCH**
- 1:15 pm – 2:30 pm **Accounting & Compliance Update**
Julie Chapel – KPMG
Jack Coman – KPMG
Brian Culvey – KPMG
Rachel Hartfield – KPMG
Keith Jordan – KPMG
Hillary Swallen - KPMG
- 2:30 pm – 3:40 pm **Natural Gas & Oil Industry Engagement on Tax Policy in Developing Countries with UN and Other International Organizations**
Daniel Witt - ITIC
Ronald Long – ITIC (BP Ret.)
Erin Norton – ITIC
Alexander Stickney - ITIC
Sonal Damani – ConocoPhillips
Matt Landy - Equinor
Aric Mann – Deloitte (Formerly of Anadarko)

3:40 pm – 3:50 pm

BREAK

3:50 pm – 5:00 pm

Carbon Pricing

Stephen Comstock – API

Karl Russo - PwC

Friday, September 24th, 2021:

Breakout Sessions Will be Designated by Color – **Domestic** & International

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|---------------------|---|
| 8:30 am - 9:40 am | Breakout Session 1 (Domestic): Tax-Exempt Investment in Oil and Gas Joint Ventures
Steven Lorch – Bracewell
Don Lonczak - Bracewell |
| 8:30 am - 9:40 am | Breakout Session 1 (International): Foreign Tax Credit Rules
Chris Riccardi – KPMG
Grant Gooding - KPMG |
| 9:40 am - 10:50 am | Breakout Session 2 (Domestic): Intersection Between Sec. 174, IDCs, and the R&D Credit
Aric Mann – Deloitte
Mark Hindes – Deloitte
Valentina Novakovic – Deloitte |
| 9:40 am - 10:50 am | Breakout Session 2 (International): OECD Pillars One and Two
Jeff Vanderwolk – SquirePattonBoggs |
| 10:50 am - 11:00 am | BREAK |
| 11:00 am – 12:00 pm | Breakout Session 3 (Domestic): Practical Considerations for a 2021 Transition
John Harrell – PwC
Cristy Turgeon – PwC
Nita Asher – PwC
Marc Caillouet - PwC |
| 11:00 am – 12:00 pm | Breakout Session 3 (International): Select International Tax Issues in Debt Restructurings
Greg Matlock – Mayer Brown
Lucas Giardelli – Mayer Brown
Shawn O’Brien – Mayer Brown |
| 12:00 pm – 1:15 pm | Lunch |

- 1:15 pm – 2:30 pm **Breakout Session 4 (Domestic): SPACs, IPO, and the use of Up-C Structures**
Chris Lallo - EY
Mitra Ghaemmaghami – EY
- 1:15 pm – 2:30 pm **Breakout Session 4 (International): International Tax Considerations without an FOGEI Exemption**
Brittany Beck - PwC
Mike DiFronzo – PwC
Rebecca Lee - PwC
- 2:30 pm – 3:40 pm **Breakout Session 5 (Domestic): CCUS**
Barbara De Marigny – BakerBotts
Eric Ensminger – BP
Ivan Thomann - BP
- 2:30 pm – 3:40 pm **Breakout Session 5 (International): Lessons Learned in Planning for International Tax Compliance Reporting**
Sajaak de Pagter – EY
Daniel McMaster - EY
Sarah Busker - EY
- 3:40 pm – 3:50 pm **BREAK**
- 3:50 pm – 5:00 pm **Breakout Session 6 (Domestic): Renewables in the O&G Sector**
Michael Platner – Van Ness Feldman
- 3:50 pm – 5:00 pm **Breakout Session 6 (International): Foreign Tax Credit Rules**
Mark Martin – KPMG
Paul Glunt - KPMG