PRELIMINARY PROGRAM

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 (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

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**
Ron Dabrowski – KPMG
Chetan Vagholkar - 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**
<table>
<thead>
<tr>
<th>Time</th>
<th>Session Title</th>
<th>Speakers</th>
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<tbody>
<tr>
<td>1:15 pm – 2:30 pm</td>
<td><strong>Breakout Session 4 (Domestic): SPACs, IPO, and the use of Up-C Structures</strong></td>
<td>Chris Lallo - EY&lt;br&gt;Mitra Ghaemmaghami – EY</td>
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<td>1:15 pm – 2:30 pm</td>
<td><strong>Breakout Session 4 (International): International Tax Considerations without an FOGEI Exemption</strong></td>
<td>Brittany Beck - PwC&lt;br&gt;Mike DiFronzo – PwC&lt;br&gt;Rebecca Lee - PwC</td>
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<td>2:30 pm – 3:40 pm</td>
<td><strong>Breakout Session 5 (Domestic): CCUS</strong></td>
<td>Barbara De Marigny – BakerBotts&lt;br&gt;Eric Ensminger - BP&lt;br&gt;Ivan Thomann - BP</td>
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<td>2:30 pm – 3:40 pm</td>
<td><strong>Breakout Session 5 (International): Lessons Learned in Planning for International Tax Compliance Reporting</strong></td>
<td>Sajaak de Pagter – EY&lt;br&gt;Daniel McMaster - EY</td>
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<td>3:40 pm – 3:50 pm</td>
<td><strong>BREAK</strong></td>
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<td>3:50 pm – 5:00 pm</td>
<td><strong>Breakout Session 6 (Domestic): Renewables in the O&amp;G Sector</strong></td>
<td>Michael Platner – Van Ness Feldman</td>
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<td>3:50 pm – 5:00 pm</td>
<td><strong>Breakout Session 6 (International): Foreign Tax Credit Rules</strong></td>
<td>Chetan Vagholkar - KPMG</td>
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