PRELIMINARY PROGRAM

Agenda Subject to Change. All Times are Central Time.

Thursday, September 23rd, 2021

**General Session**
Heather Beck Crowder – P66

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

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.)
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
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): TBD
KPMG

9:40 am - 10:50 am  Breakout Session 2 (Domestic): Intersection Between Sec. 174, IDCs, and the R&D Credit
Aric Mann – Deloitte

9:40 am - 10:50 am  Breakout Session 2 (International): OECD Pillars One and Two
Jeff Vanderwolk – Squire Patton Boggs

10:50 am - 11:00 am  BREAK

11:00 am – 12:00 pm  Breakout Session 3 (Domestic): Practical Considerations for a 2021 Transition
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
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**
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**
TBD