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)
<table>
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<tr>
<th>Time</th>
<th>Session</th>
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<tr>
<td>3:40 pm – 3:50 pm</td>
<td>BREAK</td>
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<td>3:50 pm – 5:00 pm</td>
<td>Carbon Pricing</td>
<td>Stephen Comstock – API</td>
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<td>Karl Russo - PwC</td>
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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
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