

## 83<sup>rd</sup> Annual API Federal Tax Forum

April 24-25, 2017 | Houston Westin Memorial | Houston, TX | [www.api.org](http://www.api.org)

\*Updated 4/10/17

Monday, April 24, 2017		Tuesday, April 25, 2017	
7:30am – 5:00pm	<b>Registration</b>	<b>Registration</b>	
7:30am – 8:30am	<b>Continental Breakfast</b> Sponsored by Baker Botts LLP	<b>Continental Breakfast</b> Sponsored by EY	
	<b>General Session</b> <i>Sandy Macfarlane</i> , Chevron Presiding Officer	<b>Breakout Session:</b> Domestic	<b>Breakout Session:</b> International
8:30am – 9:30am	<b>Washington Update</b> <i>Brian Johnson</i> , API & <i>Jonathan Traub</i> , Deloitte	<b>Tax Accounting Update</b> <i>Brandon Carlton</i> , <i>Jennifer Hoffman</i> , and <i>Matt Rychlicki</i> EY	<b>International Update</b> <i>Rob Dabrowski</i> & <i>Caren Shein</i> & <i>Kimberly Roth</i> KPMG
9:30am -10:30am	<b>GOP Blueprint on Tax Reform</b> <i>Bob Carroll</i> , <i>Ray Beaman</i> , EY & <i>Stephen Comstock</i> , API	<b>Domestic Oil and Gas Tax Credits</b> <i>Jeff Lambert</i> Lambert Tax Consultants, LLC	<b>Treaty Issues and Issues with Proposed Blueprint</b> <i>Shawn O'Brien</i> , <i>Lew Greenwald</i> & <i>Ed Ostenberg</i> , Mayer Brown  <i>Mark Hoose</i> , P66
10:30am – 10:50am	<b>Break</b>	<b>Break</b>	<b>Break</b>
10:50am – 12:00pm	<b>Rise of APA Issues and Litigation Update</b> <i>Jim Gadwood</i> & <i>Andrew Strelka</i> Miller & Chevalier	<b>Structuring Tax Provisions in Oil and Gas JOAs</b> <i>James Chenoweth</i> Baker Botts	<b>Transition Issues on a Move to Territorial System</b> <i>Scott Farmer</i> & <i>Peter Daub</i> Morgan, Lewis & Bockius
12:00pm – 1:15pm	<b>Lunch</b> Sponsored by Deloitte	<b>Lunch</b>	<b>Lunch</b>
1:15pm – 2:30pm	<b>IRS Update</b> <i>David Blair</i> & <i>David Fischer</i> Crowell & Moring	<b>MLP QI Regulations/ Up-C Structure – Partnership Update</b> <i>Tim Fenn</i> , Latham & Watkins	<b>Ever-shifting Sands Outside the US</b> <i>Kathryn O'Brien</i> & <i>James Ginty</i> , PwC
2:30pm – 3:30pm	<b>New Partnership Audit Rules</b> <i>Travis Greaves</i> & <i>Josh Wu</i> Caplin & Drysdale	<b>Earnouts and Other Techniques for Addressing the Bid-Ask Spread</b> <i>Liz McGinley</i> , Bracewell LLP	<b>Extractive Industries Taxation in Developing Countries – UN Update</b> <i>Karl Schmalz</i> , ITIC
3:30pm – 3:50pm	<b>Break</b>	<b>Break</b>	<b>Break</b>
3:50pm – 5:00pm	<b>Changing Dynamics of the Tax Function or Oil and Gas Market Update</b> <i>Mark Sumlin</i> & <i>Chris Kontaridis</i> , PWC	<b>Domestic Tax Issues</b> <i>Bob Swiech</i> & <i>Chad Libertus</i> , KPMG	<b>BEPS and Country by Country Updates</b> <i>Dave Varley</i> & <i>Firas Zebian</i> Deloitte
5:00pm – 6:00pm	<b>Networking Reception</b> Sponsored by KPMG		