

	Monday - April 27th, 2015	Tuesday - April 28th, 2015		
	Registration, Continental Breakfast	Continental Breakfast sponsored by Deloitte		
Time	General Session: Jaime Spellings, ExxonMobil, Presiding officer	Domestic Session: Stephen Comstock, API - Presiding	International Session: Heather Crowder, ConocoPhillips - Presiding	
8:30 - 9:30	Washington Report Update on Issues Impacting the Industry in Washington DC Stepehn Comstock - API Jon Traub - Deloitte	Domestic Update Discussion of various domestic tax issues of interest and concern Brandon Carlton, Greg Matlock, and Susan Thibodeaux - EY	International Update Discussion of various foreign tax issues of interest or concern Seth Abrams and Gretchen Sierra Deloitte	
Break	Break	Break	Break	
9:45 - 10:45	Current Issues in Managing Tax Controversies A Discussion of Issues that Arise in Audits and Appeals, including Managing Tax Attributes and Other Issues that involve Multiple Tax Years George Hani, Kevin Kenworthy, and Mary Prosser Miller & Chevalier	Distressed Situations in Oil and Gas Discussion of unanticipated consequences to energy companies resulting from restructuring debt, recapitalizing, cancelling debt and other related events Elizabeth McGinley and G. Alan Rafte Bracewell & Giuliani LLP	West Africa Update Overview of tax issues with a select group of African countries, including Gabon, Angola, Mozambique, Senegal, Liberia, and Sierra Leon Driaan Rupping, Gilles De Vignemont, Eduardo Paiva, and Robert Smallwood - PwC	
Break	Break	Break	Break	
11:00 - 12:15 (75min)	Partnership 101 Discussion of partnership tax issues for oil and gas, including back to the basics, elect outs, and Model Partnership Agreement Richard Blumenreich, Robert Swiech and Jim Tod - KPMG	Back to the Basics: Depletion Discussion of Depletion, including a historical perspective and tax fundamentals Ted McElroy - Deloitte	Foreign Tax Credits in Oil and Gas Discussion of the foreign tax credit in the oil and gas industry -- with specific discussion on section 907 Jose Murillo, John Fiorito and Richard Overton - EY	
12:15 - 1:45	Lunch	Lunch - Sponsored by Baker Botts		
1:45 - 2:45	Tax Aspects of LNG Development Discussion of tax issues related to building LNG facilities in the United States James Reardon - Porter Hedges LLP Dale Cummings, Greg Maxim, and Wes Jackson - Cummings Westlake, LLC.	ASC 740: Tax Provisions Discussion of financial accounting and reporting standards for the effects of income taxes in current and preceding years Bobby Marandi and David Wiseman - PwC	International Partnership Issues A panel discussion about the international partnership issues in the oil and gas industry Ron Dabrowski, Seth Green and Kimberly Roth - KPMG	
2:45 - 3:45	Ethical Issues Facing Tax Departments Today The session will provide guidance and information on tax ethics and professional standards for tax executives within a company's tax department Shawn O'Brien and Edward Osterberg Mayer Brown	Repair Regs (Where are We Now) A look at where we are now that the Repair Regs are in place and effective James Atkinson & Peter Balmanis - KPMG Nancy Piwonka - Marathon Oil Nicole Busey - Marathon Petroleum	Transfer Pricing Update Discussion of recent issues and guidance on transfer pricing Pete Lowy, Pat Lewis, Clark Armitage Caplin & Drysdale Mark Martin - McDermott Will & Emery	
Break				
4:00 - 5:00	Economic Outlook: American Energy Renaissance Update (Low Price Market) A Discussion of the current business environment for the oil and gas industry Stephen Landry and Foster Mellen EY	Tax Issues in the Dispositions of Oil and Gas Assets A discussion of tax planning issues relating to the disposition of oil and gas assets James Chenoweth Baker Botts	BEPS (and More) Implications of BEPS with an emphasis on CBC, hybrid mismatch and transfer pricing guidelines -- with additional commentary of EU commission investigations David Blair and Salome Cisnal De Ugarte Crowell & Moring LLP	
5:00 - 6:00	Opening Reception - Sponsored by KPMG			