

	April 23rd		April 24th	
	General Session		Breakout Session A	Breakout Session B
8:30 AM	Washington Report - Michael Platner (API); Marc Gerson (Miller & Chevalier)		Proposed Tangible Regs - Potential Impacts on the Oil and Gas Industry (James Atkinson - Winston & Strawn; Bill Jones - COP)	General International Upstream - A run down of the common forms and operation of contracts found or used in upstream ventures in foreign jurisdictions (e.g., production sharing, tax and royalty regimes, tax paid contracts, service contracts, etc.) and their U.S. tax treatment (Deborah Byers and Jose Murillo - E&Y; Rick Hopkinson - Devon)
8:45 AM				
9:00 AM				
9:15 AM				
9:30 AM	LNG Tax Issues - Transfer pricing, U.S. taxation of operations and other structure issues (Mark Martin, Cym Lowell and John Woodruff - Gardere & Wynn)		Legal Ethics Hour - Various Topics (Emily Parker and Robert Probasco - Thompson & Knight)	FAS 109/FIN 48: Focus on Oil and Gas and International Issues (Mike Terracina - KPMG; Cathy Zabel - Marathon)
9:45 AM				
10:00 AM				
10:15 AM				
10:30 AM	Break		Break	Break
10:45 AM	Master Limited Partnerships - Explanation of why they may be on the rise again and issues presented if considering one (Jeff Winters - PWC; Tim Fenn - Vinson & Elkins)		Cost Recovery Issues - A general discussion of cost recovery associated with tangible and intangible issues (168(g), 169, 179C, 1.263-5, upfront payments to vendors, treatment of emission credits). (Bob Zarzar - PWC and Bob Gordon - BP)	International Update - Review and update of changes: PTI/Dual Consolidated/Technical Taxpayer/Currency Regs/Cases (Amin Nosrat - Deloitte; Kyle Bibb - ConocoPhillips)
11:00 AM				
11:15 AM				
11:30 AM				
11:45 AM	Lunch - The Impact of the Changing Work Force in Houston on the Industry - Stephen Klineberg, Professor, Rice University		Lunch - Use of Ethanol in the U.S. Fuel System - Mike Leister, Marathon	
12:00 PM				
12:15 PM				
12:30 PM				
12:45 PM				
1:00 PM				
1:15 PM				
1:30 PM				
1:45 PM	Current Events - Ira Shepard		Roots of Oil and Gas Taxation - Economic Interests, IDC and Depletion (Ray Jones - E&Y; Tom Rathgeb - Shell)	U.S. Taxation of Canadian Tar Sands (Terry Pearson - E&Y)
2:00 PM				
2:15 PM				
2:30 PM				
2:45 PM	M-3 Reporting Issues - How is the M-3 being used? What experiences are out there with it? New partnership M-3. (Jim Dougherty, Robert Kilinskis, John Keenan - Deloitte)		10 years of the API Model Partnership Agreement - Review of the agreement and the provisions (Bob Sweich - KPMG; Steven Schneider - Miller & Chevalier)	Aggregate v. Entity - Partnership Issues in the International Context (Sonali Ghandi and Amy Sutton - Deloitte, Chris Delk - COP)
3:00 PM				
3:15 PM				
3:30 PM	Break		Break	Break
3:45 PM	Break			
4:00 PM	Transfer Pricing: Service and Cost Sharing Regs - Current state and concerns (John Wells and Tom Zollo - KPMG, Morris Clark - Marathon)		GOM Contracting Issues - Case study of tax issues and concerns being seen in current deals (Byron Ratliff - PWC, Mike Pearl - Anadarko, James Touns - Apache Corp.)	Renegotiation of the Fiscal Take in Foreign Jurisdictions - looking at the various tax issues presented in new contracts and arrangements being seen in foreign jurisdictions
4:15 PM				
4:30 PM				
4:45 PM				