

# 2003 Parker C. Fielder Oil and Gas Tax Conference

## October 23-24, 2003 • • Houston,

### Thursday Morning, Oct. 23, 2003

8:45 am 0.75 hr	<p><b>A World Perspective on Petroleum and Its Development, or a History of the Oil and Gas Industry in the Middle East</b></p> <p>Where is the oil located throughout the world? Who controls it? What types of contracts or arrangements are being used to develop the petroleum?</p> <p>Christopher Moyes, Moyes &amp; Co., Inc. - Dallas, TX</p>
9:00 am 1.00 hr	<p><b>&amp;nbsp; B. Domestic Taxation: Advanced Issues</b></p>
9:00 am 1.00 hr	<p><b>&amp;nbsp; A. International Taxation: Advanced Issues</b></p>
9:00 am 1.00 hr	<p><b>Optional Thursday Luncheon with Emily Parker</b></p>
9:30 am 1.00 hr	<p><b>Capital Cost Recovery and Other Current Domestic Issues</b></p> <p>Asset class-lives for service station canopies, gathering lines, offshore drilling platforms and chemical vs. refinery assets; Brookshire decision on change of accounting method; contributions to construction, bonus depreciation and transition rules; pending rev. proc. on recoverable reserves; charitable donations of technology, core samples and G&amp;G data.</p> <p>Carl Boetticher, Hunt Oil Company - Dallas, TX  Stephen Edward Comstock, Washington, DC  John Eiman, IRS - Houston, TX  Thomas L. Evans, Kirkland &amp; Ellis LLP - Washington, DC  George Manousos, Office of the Tax Legislative Counsel, U - Washington, DC  Ted E. McElroy, Arthur Andersen - Houston, TX</p>
10:50 am 0.75 hr	<p><b>Indopco Regulations on Capitalization</b></p> <p>This panel presents both an update of developments on the promulgation of the proposed regulations for capitalization of intangibles and a discussion regarding certain aspects of the regulations, such as merger and acquisition costs, the 12-month rule, certain contracts, and other issues raised in public comments.</p> <p>Jim Butler, Holme Roberts &amp; Owen LLP - Denver, CO  William H. Jones, Houston, TX  Andrew J. Keyso Jr., Internal Revenue Service - Washington, DC  George Manousos, Office of the Tax Legislative Counsel, U - Washington, DC  C. Elizabeth Wagner, National Association Of Bond Lawyers - Washington, DC</p>

11:35 am  
0.82 hr

### **Significant Current Developments in International Taxation**

Update of significant guidance and developments relating to taxation of cross-border transactions.

Ronald G. Bauer, BP America, Inc. - Warrenville, IL  
Harry J.(Hal) Hicks III, Associate Chief Counsel (International), - Washington, DC  
Nancy R. Johnson, IRS - Dallas, TX  
Mark Allen McArthur, Chevron - Houston, TX  
Ken Wood, Ernst & Young LLP - Washington, DC  
Steven C. Wrappe, Deloitte & Touche LLP - Washington, DC

## **Thursday Afternoon, Oct. 23, 2003**

12:30 pm  
0.32 hr

### **Luncheon Presentation - Advocating for the Client in Audits**

Optional luncheon presentation.

Emily A. Parker, Thompson & Knight LLP - Dallas, TX

2:00 pm  
1.25 hrs

### **Financing Oil and Gas Operations: Domestic and International Issues**

An examination of how oil and gas companies finance operations in both the domestic and international contexts, including the tax consequences of the financing structures; large company versus small company; general versus project financing; debt-equity and hybrid structures.

Douglas E. Berg, Internal Revenue Service - NO LONGER AT - Houston, TX  
John Thomas Bradford, Houston, TX  
Jack Harmuth, Noble Energy, Inc. - Houston, TX  
Jim McBride, The Royal Bank of Scotland - Houston, TX  
Byron Ratliff, PriceWaterhouseCoopers - Houston, TX

3:30 pm  
1.32 hrs

### **International Taxation: Advanced Issues**

Section 367(b) regulations; Section 987 and 1503(d) issues; corporate restructuring; collateral effects of check-the-box regulations; advanced foreign tax credit issues.

Judith M. Blissard, Vinson & Elkins LLP - Houston, TX  
David Delahay, ConocoPhillips - Bartlesville, OK  
Anne O'Connell Devereaux, Office of the Associate Chief Counsel (I - Washington, DC  
Alan L. Fischl, PricewaterhouseCoopers LLP - Washington, DC  
Harry J.(Hal) Hicks III, Associate Chief Counsel (International), - Washington, DC  
John Stephen Reptsis, Dallas, TX  
Walter Schiller, ChevronTexaco Corporation - San Ramon, CA

3:30 pm  
1.32 hrs

### **Domestic Taxation: Advanced Issues**

Domestic partnership issues, including the Section 761 election out of Subchapter K and the proposed contingent liability regulations under Section 752; new partnership option regulations; Section 43 significant expansion; qualified tertiary injectants.

Roy Richard Coston, Fulbright & Jaworski - Houston, TX  
David B. Cubeta, Miller & Chevalier Chartered - Washington, DC  
Audrey Ellis, Office of Associate Chief Counsel (Passt - Washington, DC  
Paul Kugler, KPMG LLP - Washington, DC  
Jeff C. Lamberth, Berie Lamberth & McInnis - Houston, TX  
Eric B. Lee, IRS - Washington, DC

## **Friday Morning, Oct. 24, 2003**

8:30 am  
1.00 hr

### **Ethics and Corporate Tax Minimization**

Current issues in ethics and corporate tax minimization strategies.

Roland Barral, LMSB Area Counsel, Financial Services In - New York, NY  
Deborah Butler, Associate Chief Counsel, Procedure and A - Washington, DC  
Richard Allen Hussein, Baker & Botts - Houston, TX  
Phillip L. Mann, Miller & Chevalier Chartered - Washington, DC  
Eric Solomon, Deputy Assistant Secretary (Regulatory A - Washington, DC  
Paul D. Wessells, Haymarket, VA

9:30 am  
0.82 hr

### **Pre-filing, Post-filing, Audit and Appeals Procedural Issues, and Professional Responsibility**

Alternative dispute resolution; fast track mediation; pre-filing agreements; industry issues resolution (IRR) program; APAs; computerization of tax records; mandatory IDRs and tax accrual workpapers; tax shelter settlements.

Warren Brechtel, Chevron Corporation - San Francisco, CA  
Carl Patrick Castellan, Exxon Mobil Corporation - Houston, TX  
Ben Clayton, ConocoPhillips - Bartlesville, OK  
Art B. Cohen, Internal Revenue Service - Dallas, TX  
Ronnie L. Desbrow, IRS - Houston, TX  
Ralph B. Portell Jr., BP Exploration (Alaska) Inc - Anchorage, AK

10:40 am  
0.75 hr

### **Acquisition and Disposition Issues**

Like kind exchanges; selling assets versus selling stock; Section 614 separate property election; use of production payments; use of partnerships to effect dispositions.

Thomas Crichton IV, Vinson & Elkins - Dallas, TX  
Jim Meara, Marathon Oil Corporation - Houston, TX  
Edith F. Moates, IRS - Oklahoma City, OK  
Barksdale Penick, Ernst & Young LLP - Washington, DC  
R. David Wheat, Thompson & Knight LLP - Dallas, TX  
William H. Wilson Jr., IRS - Dallas, TX

11:25 am  
1.00 hr

## **Recent Litigation and Emerging Issues Affecting the Oil and Gas Industry**

Recent and pending cases; legislation update; treaty update, including new tax in the United Kingdom.

Buford P. Berry, Thompson & Knight - Dallas, TX  
Andrew B. Breslow, Exxon Mobil Corp - Irving, TX  
Charles W. Hall, Fulbright & Jaworski - Houston, TX  
Kevin L. Kenworthy, Miller & Chevalier Chartered - Washington, DC  
Robert M. Morrison, IRS - Dallas, TX  
B. John Williams Jr., Shearman & Sterling LLP - Washington, DC