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<b>THURSDAY MORNING</b>	<b>Luncheon Presentation</b>	
<p><b>Presiding Officer:</b> <b>Bernard Nelson, Internal Revenue Service, Houston, TX</b></p> <hr/> <p><b>8:00 a.m. Registration Opens</b> Includes continental breakfast.</p>	<p><b>12:45 p.m. Pick Up Box Lunch</b> Included in conference registration fee.</p> <hr/> <p><b>1:00 p.m. .75 hr</b> <b>A View from the IRS</b> Frank Y. Ng, Internal Revenue Service, Washington, DC</p>	<p><b>3:45 p.m. 1.50 hrs</b> <b>Session B:</b> <b>The ABC's of Oil and Gas Taxation: Pool of Capital Doctrine, Economic Interest, and Depletion</b> Reexamining the basic concepts of pool of capital, economic interest, and depletion in light of current oil and gas transactions.  Moderator: R. Richard Coston, Houston, TX Noah Baer, Washington, DC Joseph H. Makurath, Washington, DC Robert A. Swiech, Houston, TX Jeffery M. Wright, Houston, TX</p>
<b>8:35 a.m. Welcoming Remarks</b>	<b>THURSDAY AFTERNOON</b>	<b>5:15 p.m. Adjourn to Reception</b>
<p>Keith M. Jones, LMSB, Industry Director, Natural Resources &amp; Construction, Internal Revenue Service, Houston, TX</p>	<p><b>Presiding Officer:</b> <b>Michael L. Platner, American Petroleum Institute, Washington, DC</b></p> <p><b>Presiding Officer:</b> <b>To Be Announced</b></p> <hr/> <p><b>2:15 p.m. 1.25 hrs</b> <b>Partnership Issues Affecting the Oil and Gas Industry</b> Definition of a partner for tax purposes; application of partnership compensatory interest proposed regulations to the oil and gas industry; anti-abuse case law, including the <i>Castle Harbour</i> decision; other partnership tax developments affecting the oil and gas industry.  Moderator: Paul Kugler, Washington, DC Thomas Crichton IV, Dallas, TX Christopher T. Kelley, Washington, DC Heather C. Maloy, Washington, DC Gregory V. Nelson, Houston, TX</p>	<b>FRIDAY MORNING</b>
<p><b>8:45 a.m. Opening Address: The State of the Industry</b> John C. Felmy, Chief Economist, American Petroleum Institute, Washington, DC</p>	<b>3:30 p.m. Break</b>	<p><b>Presiding Officer:</b> <b>Carl Boetticher, Hunt Oil Company, Dallas, TX</b></p>
<p><b>9:30 a.m. 1.50 hrs</b> <b>Capital Cost Recovery and Other Current Developments in Domestic Tax Issues</b> Section 199 issues; inventory issues; regulations on the capitalization of intangibles; environmental remediation; refracting; refining turnarounds; new R&amp;D credit; proposed energy tax legislation.  Moderator: Thomas L. Evans, Washington, DC Stephen E. Comstock, Washington, DC John F. Eiman, Houston, TX Ellen MacNeil, Washington, DC Christine M. Smith, San Ramon, CA Kenneth W. Telchik, Dallas, TX</p>	<b>CONCURRENT BREAKOUT SESSIONS</b>	<p><b>8:00 a.m. Conference Room Opens</b> Includes continental breakfast.</p>
<p><b>11:00 a.m. Break</b></p>	<p><b>3:45 p.m. 1.50 hrs</b> <b>Session A:</b> <b>International Taxation: Advanced Topics Involving the Foreign Tax Credit</b> Technical taxpayer regulations; anti-foreign tax credit generator regulations; <i>Guardian Industries</i> court decision; dual capacity regulations redux; and FOGEI/FORI redux.  Moderator: Rebecca I. Rosenberg, Washington, DC Hal J. Hicks III, Washington, DC Bethany Ingwolson, Washington, DC Nancy Johnson, Dallas, TX Edward C. Osterberg Jr., Houston, TX David A. Werman, Houston, TX</p>	<b>8:00 a.m. 1.25 hrs ethics</b>
<p><b>11:15 a.m. 1.25 hrs</b> <b>International Taxation: Transfer Pricing Issues and Other Basic International Tax Issues Relating to the Oil and Gas Industry</b> Application of transfer pricing services regulations and cost sharing regulations to the oil and gas industry; other transfer pricing issues; Subpart F developments; other international taxation developments of general interest.  Moderator: Ken Wood, Washington, DC Rocco V. Femia, Washington, DC M. Annette Glod, Houston, TX Steven A. Musher, Washington, DC Steven C. Wrappe, Washington, DC</p>	<p><b>9:15 a.m. 1.25 hrs</b> <b>Recent Litigation, Controversy, and Compliance Issues in the Oil and Gas Area</b> Case law developments; alternative dispute resolution developments; LMSB's Industry Issues Focus; IRS approach to M-3, FIN 48, and Section 199 audits; other issues.  Moderator: Emily A. Parker, Dallas, TX Ronnie L. Desbrow, Houston, TX Ben K. Hyde, Dallas, TX Keith M. Jones, Houston, TX Kevin L. Kenworthy, Washington, DC Gary L. Thompson, Houston, TX</p>	<p><b>Professional Responsibility and Ethics Issues</b> Lawyers' and CPA ethics rules; tax return preparer regulations; Circular 230 update; tax shelter update; whistleblower legislation; OECD Intermediaries Project.  Moderator: Phillip L. Mann, Washington, DC Michael J. Desmond, Washington, DC Carolyn Hinchman Gray, Washington, DC Richard A. Husseini, Houston, TX Catherine Lueck Zabel, Houston, TX</p>
<p><b>12:30 p.m. Break</b></p>		<b>10:30 a.m. Break</b>

10:45 a.m. 1.00 hr

Production Payments and Other Financing Arrangements for Oil and Gas Transactions

Current issues involving the taxation of production payments as a financing device for oil and gas transactions; cross-border arbitrage financings; earnings strippings transactions.

Moderator: Byron Ratliff, Houston, TX
Roger D. Aksamit, Houston, TX
Anne Devereaux, Washington, DC
Michael J. McGoldrick, Philadelphia, PA
David Silber, Washington, DC

11:45 a.m. .75 hr

Acquisitions and Disposition of Oil and Gas Properties

This panel will discuss the tax consequences of the acquisition and disposition of oil and gas properties, with a focus on like-kind exchanges and other current trends in structuring oil and gas transactions.

Moderator: William H. Caudill, Houston, TX
Mark McArthur, Houston, TX
Amy Pfalzgraf, Washington, DC
Kevin Thomason, Dallas, TX
Paper by Sam Merrill, Dallas, TX

12:30 p.m. Adjourn

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##### Registration & Cancellation

October 17, 2007-5 p.m.  
*last day for early registration*  
add \$50 for registrations  
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October 19, 2007-5 p.m.  
*last day for full refund*

October 22, 2007-5 p.m.  
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October 25, 2007-8:35 a.m.  
*conference begins*

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