Combined Oil and Gas Progressivity in Alaska's Production Tax

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Senate Resources Committee Alaska State Legislature

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Rear View Mirror: 5 fold increase in Production Tax 2004 - 2008

	Production Taxes				X Check				Royalty		
Fiscal Year	Prod Tax Rev (\$ 000 000)	Less CI gas (\$000 000)	Apples to Apples Rev (\$000 000)	2008\$ / 2004 \$	WC Price	Million bbls daily Prod	Million bbls annual Prod	Price times volume	2008\$ / 2004 \$	Royalty Rev (\$ 000 000)	2008\$ / 2004 \$
							(E) = (D)	(F) = (C) *			
	(A1)	(A2)	(A)	(B)	(C)	(D)	* 365	(E)	(G)	(1)	(J)
2004	651.9	(24.7)	627.2		31.74	0.999	364.6	11,573.5		1,056.1	
2005	863.2	(24.4)	838.8		43.44	0.931	339.8	14,761.6		1,419.9	
2006	1,199.5	(33.2)	1,166.3		60.80	0.858	313.2	19,040.7		1,784.1	
2007	2,208.4	(6.0)	2,202.4		61.83	0.750	273.8	16,926.0		1,613.0	
2008	4,940.5	(6.0)	6,879.0	11.0	96.51	0.730	266.5	25,715.1	2.2	2,446.1	2.3

Tax Increase attributable to changes in rules= 11.0 /2.2 = 5

*Note: Tax revenues from some North Slope gas sales will be included in revenues with no corresponding volume effect. That adjustment (adding .004 to the daily volume) will not materially affect the outcome. NS NGL are in both vols and \$. Data from Fall 2008 Revenue Sources Book, from Appendix A-4a (royalty sum of royalty & Bonuses etc.), C-2a and B-1a. Cook Inlet Gas adjustment from Fall 2007 RSB, Appendix A-5a (CI data not broken out in Fall 2008 RSB) Note: Historical volume and price data in Fall 2008 RSB differ from same historical data series in Fall 2007 RSB and earlier.

Rear View Mirror: Changes in State Take 2004-2008

			Upstream					
		Prod	Costs*	Transport .				
Fiscal	State	Value (Vol	(used '07	ation	Prod Value			
Year	Take in \$	x Val)	in 04-06)	Costs	less Costs	State %	Federal %	Prod %
	А	В	С	D	E=	F=	G=	H=
					(B-C-D)	(A/E)	(E-A)*.35)/E	(1-F-G)
2004	2,426.8	11,799.6	3,659.0	1,783.1	6,357.5	38.2%	11.7%	50.2%
2004				·	•	34.0%	15.1%	50.2 <i>%</i>
	3,395.1	15,240.7	3,659.0	1,603.9	9,977.8			
2006	4,358.9	19,454.1	3,659.0	1,700.5	14,094.6	30.9%	17.5%	51.6%
2007	5,141.7	16,863.0	3,659.0	1,478.3	11,725.8	43.8%	13.7%	42.5%
2008	11,255.0	25,715.1	3,848.0	1,612.0	20,255.1	55.6%	12.2%	32.2%
	all \$ figure	s in millions						
What if	2004 upstr	eam costs a	billion less	?				
2004	2,426.8	11,799.6	2,659.0	1,783.1	7,357.5	33.0%	14.6%	52.4%
	,	,	,	,	,			
	Source: Sta	ate take, volumes	, \$/bbl destinatio	n value, transport	tation charges and	2008 Upstrea	m Cost	

from Fall 2008 DOR Revenue Sources Book; 2007 Upstream cost from Fall 2007 RSB

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Looking Forward: TransCanada's AGIA application suggestion:

- "TransCanada would rely on the State of Alaska to take all feasible actions exclusively within its authority as a sovereign power to ensure a favorable economic environment for potential Shippers on the Project. Those actions include:
 - engaging with the ANS producers to reach agreement on a commercially reasonable and predictable upstream fiscal regime that balances the needs of the state and the ANS producers;
 - and encouraging robust exploration for and development of new natural gas resources and the commitment of such resources to the Project."

Source: TransCanada, Application for License, Alaska Gasline Inducement Act (November 30, 2007) page 2.5-52

Looking Forward: ConocoPhillips' Proposal

 ConocoPhillips' Proposal (ConocoPhillips current owner with BP of Denali Project)

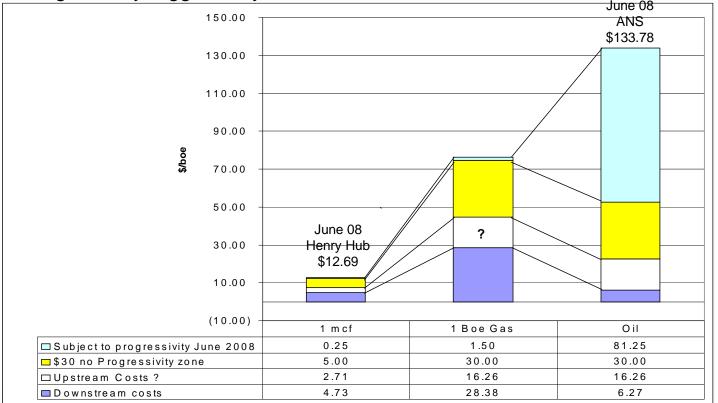
"The predominant lessee risk that should be the focus of discussion with the State is the risk of unclear, unpredictable State taxes and royalties. In order to enable shippers to make long term shipping commitments, prospective shippers need clearly defined natural gas fiscal terms and an understanding of the period during which these terms will apply. Addressing these issues remains a critical component necessary to develop ANS natural gas resources and make this Project a reality."

Dan E. Dickinson CPA Source: ConocoPhillips, ANS Natural Gas Pipeline Proposal to the State of Alaska, (November 30, 2007) section IV page 5

Looking Forward: Combined Progressivity Tax (CPT)

Gas exported from state and oil taxed at same rate – both part of combined progressivity calculation.

- Prices swings in one can effect tax on the other
- Gas converted to oil on Btu basis (roughly 6:1)
- Progressivity triggered by \$30 boe PTV





Sources: Oil data from Spring 2008 RSB, Upstream Gas Cost is oil data on boe basis, Gas Downstream cost is Black & Veatch Estimate from Appendix G <u>Alaska Gasline Determination</u>, Oil price from DOR website, Gas Price from St Louis Fed Reserve website

Looking Forward: Combined Progressivity Example 1

Daily Vol	Oil Only 0.7 mmbbls
	365
Annual Volume	255.5 mmbbls
Annual Barrel Equivalents	255.5 Annual Boe
ANS Price	\$ 79.72
Transportation to Market	(6.34)
Gross Value at Point of Production	73.38
Value times Volume	\$ 18,749
Non Royalty %	87.5%
Taxable Wellhead	\$ 16,405
US Costs (millions \$)	4,337
Taxable Value or PTV (millions \$)	\$ 12,068
Non Royalty Fraction	87.5%
Taxable volumes	223.6
Brog Boog (toxoble velue/velume)	\$ 53.98
Prog Base (taxable value/volume) Less \$30	\$ 53.98 30.00
Starting Point	\$ 23.98
Rate per dollar	0.4000%
Prog rate	9.5922%
base rate	25.0000%
Total Rate	34.5922%
Total (Tax Rate * PTV)	4,174.6

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Source: Oil & Gas prices from 1/26/08, equal volumes, US from DOR 2008 Revenue Sources Book. Gas tariff and adj to Alberta from TC 2007 AGIA Proposal. Tariff is "nominalized levelized toll including fuel"

Looking Forward: Combined Progressivity Example 2

				Incremental				
	C	Dil Only		Gas				
Daily Vol		0.7 r	nmbbls		4.2 bcf			
		365			365			
Annual Volume		255.5 r	nmbbls		1533 bcf			
			Convert to boe		6			
Annual Barrel Equivalents		255.5 A	Annual Boe		255.5 Ann B/e			
ANS Price	\$	79.72	Henry Hub Price		6.08			
			Adj to Alberta		(0.75)			
Transportation to Market		(6.34)			(2.88)			
Gross Value at Point of Production	<u> </u>	73.38			2.45			
Value times Volume	\$	18,749			3,756			
Non Royalty %		87.5%			87.5%			
Taxable Wellhead	\$	16,405		3,2	286.4			
		4 0 0 7						
US Costs (millions \$)	¢	4,337		2.0				
Taxable Value or PTV (millions \$)	\$	12,068		3,2	286.4			
Non Royalty Fraction		87.5%		8	87.5%			
Taxable volumes		223.6			223.6			
Prog Pooo (toyoble velue/velume)	\$	53.98		\$ 1	14.70			
Prog Base (taxable value/volume) Less \$30	φ	30.00	·	Ŧ	30.00			
Starting Point	\$	23.98	-	NO PF				
Rate per dollar	Ψ	0.4000%		NOFI				
Prog rate		9.5922%						
base rate		25.0000%						
Total Rate		34.5922%						
	·	51.0022/0						
Total (Tax Rate * PTV)		4,174.6						
Source: Oil & Gas prices from					nue Sources Book. Gas tariff and adj to Alberta from			

TC 2007 AGIA Proposal. Tariff is "nominalized levelized toll including fuel"

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Looking Forward: Combined Progressivity Example 3

				Incremental			
	Oil (-		Gas		Combined	
Daily Vol		0.7	mmbbls	4.2	bcf		
		365		365			
Annual Volume		255.5	mmbbls	1533	bcf		
			Convert to boe	-			
Annual Barrel Equivalents		255.5	Annual Boe	255.5	Ann B/e	511.00	Ann B/e
ANS Price	\$	79.72	Henry Hub Price	6.08			
			Adj to Alberta	(0.75)			
Transportation to Market		(6.34)		(2.88)			
Gross Value at Point of Production		73.38		2.45			
Value times Volume		8,749		3,756			
Non Royalty %	(87.5%		87.5%			
Taxable Wellhead	\$1	6,405		3,286.4			
US Costs (millions \$)		4,337					
Taxable Value or PTV (millions \$)		2,068		3,286.4		15,354.4	
Nen Develty Freetien		07 50/		07 50/		07 50/	
Non Royalty Fraction		87.5%		87.5%		87.5%	
Taxable volumes		223.6		223.6		447.1	
Prog Base (taxable value/volume)	\$	53.98		\$ 14.70		34.34	
Less \$30		30.00		30.00	_	30.00	
Starting Point	\$	23.98		NO PROG	_	4.34	
Rate per dollar	0.4	4000%			_	0.4000%	
Prog rate	9.5	5922%			_	1.7361%	
base rate	25.0	0000%			_	25.0000%	
Total Rate	34.5	5922%			_	26.7361%	
					(Smaller r	ate times lar	ger base)
Total (Tax Rate * PTV)	4,	174.6		(69.4)		4,105.2	

Source: Oil & Gas prices from 1/26/08, equal volumes, US from DOR 2008 Revenue Sources Book. Gas tariff and adj to Alberta from TC 2007 AGIA Proposal. Tariff is "nominalized levelized toll including fuel"

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Model Screen Shot

Daily Vol days per year Annual Volume Convert to boe	• •	Oil	Only 0.700 mmbbls/day 365 255.5 mmbbls/yr 1	• •	Incre	emental Gas 4.2 bcf/day <u>365</u> 1533 bcf/yr 6		Combined
Annual Barrel Equivalents			255.5 boe/yr			255.5 boe/yr		511.0 boe/yr
ANS WC Price/ Henry Hub Price Adj to Alber	ta 📕	\$	80.00	• •	\$	6.00 (0.75)		
Transportation to Market			(6.00)		_	(2.75)		
Gross Value at Point of Production			74.00			2.50		
Value times Volume		\$	18,907		\$	3,833		
Non Royalty %			7.5%			87.5%	_	
		\$	16,544		\$	3,353		
US Costs (millions \$)		<u>Ф</u>	4,300			-	<u>۴</u>	45 507
Taxable Value or PTV (millions \$)		\$	12,244			3,353	\$	
Non Royalty Fraction			7.5% 20. 0			87.5%		87.5%
Taxable volumes boe		22	23.6			223.6		447.1
Prog Base (taxable value/volume)		\$	54.77		\$	15.00	\$	34.88
Less \$30			30.00			30.00		30.00
Starting Point		\$	24.77		\$	-	\$	4.88
Prog rate (.4% or .1% per dollar)		9.9	91%			0.00%		1.95%
base rate		25.	.00%			25.00%		25.00%
Total Rate		34.	.91%			25.00%		26.95%
		Stand /	Alone Oil		Stan	d Alone Gas		Combined
Total Tax (Tax Rate * PTV)		\$	4,274			838.4	\$	4,204
Sum of stand alone oil & g	as		5,112.1	7				
Gain (loss) in production tax fro using current law vs stand alo						(908.3	3)	
Gain (loss) in production adding gas stream under o						(69.9)		
					-			

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Model Screen Shot – 350 K bbls oil/day

Daily Vol days per year Annual Volume	• •	Oil Only 0.350 mmbbls/day 365 127.8 mmbbls/yr	Incremental Gas 4.2 bcf/day 365 1533 bcf/yr	Combined
Convert to boe Annual Barrel Equivalents		127.8 boe/yr	<u> </u>	383.3 boe/yr
ANS WC Price/ Henry Hub Price Adj to Albert	a	\$ 80.00	▲ ▶ \$ 6.00 (0.75)	
Transportation to Market		(6.00)	<u> </u>	
Gross Value at Point of Production	-	74.00 © 0.454		
Value times Volume Non Royalty %		\$ 9,454 87.5%	\$	
Taxable Wellhead	-	\$ 8,272	\$ 3,353	
US Costs (millions \$)		3.300		
Taxable Value or PTV (millions \$)		\$ 4,972	3,353	\$ 8,325
Non Royalty Fraction		87.5%	87.5%	87.5%
Taxable volumes boe		111.8	223.6	335.3
Prog Base (taxable value/volume) Less \$30		\$ 44.48 30.00	\$ 15.00 30.00	\$ 24.83 30.00
Starting Point		\$ 14.48	\$ -	\$ -
Prog rate (.4% or .1% per dollar)		5.79%	0.00%	0.00%
base rate		25.00%	25.00%	25.00%
Total Rate		30.79%	25.00%	25.00%
Total Tax (Tax Rate * PTV)	-	Stand Alone Oil \$ 1,531	Stand Alone Gas 838.4	Combined \$ 2,081
Sum of stand alone oil & ga	=	2,369.2		φ 2,001
Gain (loss) in production tax fro using current law vs stand alo	m		(287.9)	
Gain (loss) in productio adding gas stream under c			550.4	

Model Screen Shot - \$135 oil and \$6 gas - Tax Falls

Daily Vol	4 F	Oil Only 0.350 mmbbls/day	Incremental Gas	Combined
days per year		365	365	
Annual Volume	_	127.8 mmbbls/yr	1533 bcf/yr	
Convert to boe		1	6	
Annual Barrel Equivalents		127.8 boe/yr	255.5 boe/yr	383.3 boe/yr
ANS WC Price/ Henry Hub Price		\$ 135.00	● ● ● ● ● ● ● ● ● ● ● ● ● ● ● ● ● ● ●	
Adj to Albert	a		(0.75)	
Transportation to Market		(6.00)	(2.75)	
Gross Value at Point of Production		129.00	2.50	
Value times Volume		\$ 16,480	\$ 3,833	
Non Royalty %	_	87.5%	87.5%	
Taxable Wellhead		\$ 14,420	\$ 3,353	
US Costs (millions \$)	_ ◀ ▶ \	3,300	• • -	
Taxable Value or PTV (millions \$)		\$ 11,120	3,353	\$ 14,473
Non Royalty Fraction		87.5%	87.5%	87.5%
Taxable volumes boe		111.8	223.6	335.3
Prog Base (taxable value/volume)		\$ 99.48	\$ 15.00	\$ 43.16
Less \$30		30.00	30.00	30.00
Starting Point		\$ 69.48	\$ -	\$ 13.16
Prog rate (.4% or .1% per dollar)		25.70%	0.00%	5.26%
base rate		25.00%	25.00%	25.00%
Total Rate		50.70%	25.00%	30.26%
		Stand Alone Oil	Stand Alone Gas	Combined
Total Tax (Tax Rate * PTV)		\$ 5,637	838.4	\$ 4,380
Sum of stand alone oil & g	as –	6,475.84		
Gain (loss) in production tax fro	om	<u> </u>	(2,005,7)]
using current law vs stand alo			(2,095.7)	
Gain (loss) in productio	n tax from			-
adding gas stream under c			(1,257.3)	
adding gas stream under c	unentiaw.			

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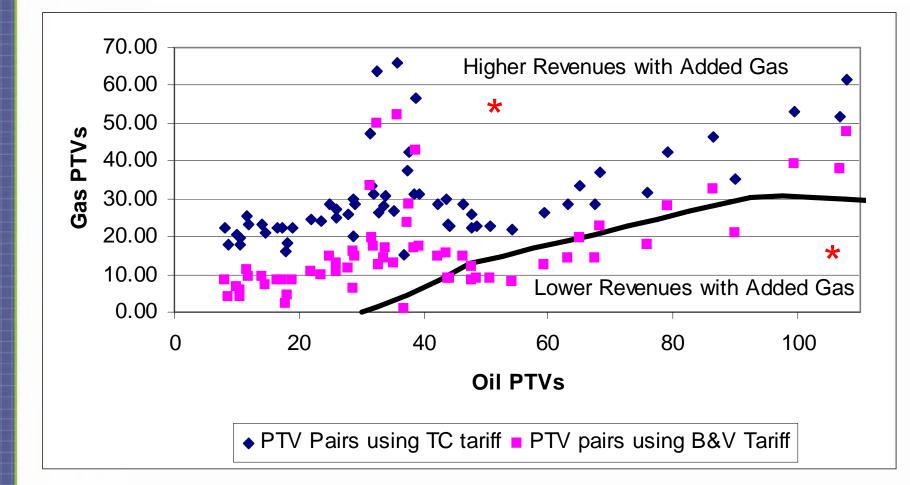
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Model Screen Shot - \$180 oil and \$13 gas - Taxes Rise

		Oil Only		Incremental Gas	Co	mbined
Daily Vol		0.350 mmbbls/day		4.2 bcf/day		
days per year		365		365		
Annual Volume		127.8 mmbbls/yr		1533 bcf/yr		
Convert to boe		1		6		
Annual Barrel Equivalents		127.8 boe/yr		255.5 boe/yr		383.3 boe/yr
ANS WC Price/ Henry Hub Price	4 1 \$	80.00		\$ 13.00		
Adj to Albert	a			(0.75)		
Transportation to Market	▲ ▶	(6.00)	_ ()	(2.75)		
Gross Value at Point of Production		74.00		9.50		
Value times Volume	\$	9,454		\$ 14,564		
Non Royalty %		87.5%		87.5%		
Taxable Wellhead	\$	8,272		\$ 12,743		
US Costs (millions \$)		3,300		-		
Taxable Value or PTV (millions \$)	\$	4,972		12,743	\$	17,715
Non Royalty Fraction		87.5%		87.5%	8	37.5%
Taxable volumes boe	_	111.8		223.6		335.3
Prog Base (taxable value/volume)	\$	44.48		\$ 57.00	\$	52.83
Less \$30		30.00		30.00		30.00
Starting Point	\$	14.48		\$ 27.00	\$	22.83
Prog rate (.4% or .1% per dollar)		5.79%		10.80%	g	0.13%
base rate		25.00%		25.00%		25.00%
Total Rate		30.79%		35.80%		34.13%
	St	and Alone Oil		Stand Alone Gas	Co	mbined
Total Tax (Tax Rate * PTV)	\$	1,531		4,562.0	\$	6,046
Sum of stand alone oil & g	as	6,092.9	0			
Gain (loss) in production tax fro						
using current law vs stand alo				(46.7)		
Gain (loss) in productio						
		L		4,515.3		
adding gas stream under c	unentiaw.					

Oil and Gas PTVs 2004 - 2008



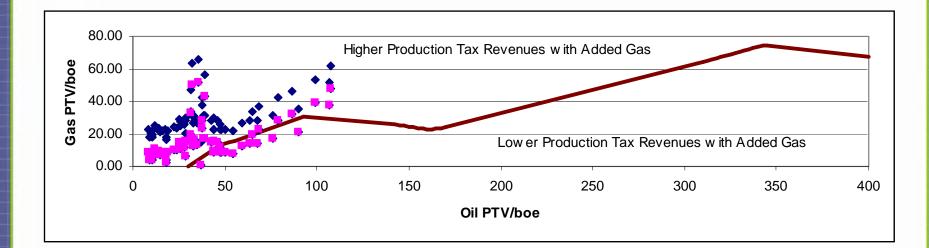
Source: Oil Prices and Costs from DOR 2007 RSB and website. Gas Prices from St. Louis Federal Reserve Web Site TC Tariff from January 15, 2008 revision of November 2007 AGIA Application, page 2.10-4, Black & Veatch Tariff from From May 2008 AGIA NPA Analysis Report page 121.

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Oil and Gas PTVs 2004 - 2008

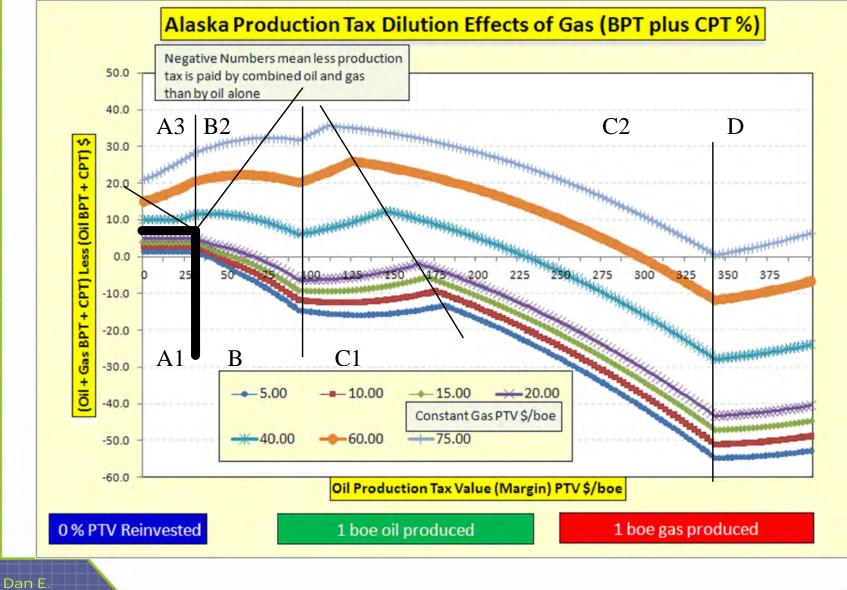


Source: Oil Prices and Costs from DOR 2007 RSB and website. Gas Prices from St. Louis Federal Reserve Web Site TC Tariff from January 15, 2008 revision of November 2007 AGIA Application, page 2.10-4, Black & Veatch Tariff from From May 2008 AGIA NPA Analysis Report page 121.

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Dr. Wood's Illustration Divided into Zones



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