

Alaska's Oil and Gas Taxation – HB111\O

Lifecycle Scenario Analysis Presentation to House Resources Committee

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February 17, 2017

What Will Be Presented Today

- Summary of HB111\O Impacts on Modeling
- Modeling Assumptions
- Scenario Analysis economics of changes
 - Status Quo (HB247) Lifecycle analysis of two potential new North Slope fields (small and large).
 - Potential Impacts of HB111 changes on new North Slope fields.

What are the Major Tax Changes in HB111\O

	Status Quo	HB111		
Net Operating Loss (NOL) Provisions				
NOL Credit %	35%	15%		
GVR can make NOL larger	no	no		
Per Taxable Barrel Credit Provisions				
Gross Value Reduction (GVR) 024i (fixed)	\$5 / bbl	\$5 / bbl		
GVR limited to 3 yrs & \$70/bbl oil	yes	yes		
non-GVR 024j (sliding scale)	\$0 - \$8 / bbl	\$0 - \$5 / bbl		
Credit Repurchases				
Max Production to qualify	50,000/bpd	15,000/bpd*		
Maximum per year @ 100%	\$35M	eliminated		
Maximum per year @ 75%	\$35M	eliminated		
Minimum Tax Provisions				
Min Tax % of Gross Value (GVPP)	4%	5%		
NOL credits against Min Tax	yes	no		
024i credits against Min Tax	yes	no		

^{*}This provision does not impact modeling since the only credit that a North Slope producer can earn post-1/1/18 is the NOL and the cash repurchase provision was eliminated for all producers.

Modeling Assumptions

- ➤ All Fields begin development 1/1/2018
- Does not include Exploration Costs
- Includes price and cost inflation (based on Callan 2.25% rate)
- For Status Quo modeling, after GVR ends the producer opts to use their sliding scale per-taxable barrel credits, which requires tax payments not got below the minimum tax.
- ➤ For Status Quo modeling, producer opts to only apply for \$35 million of repurchasable credits per year (and forgo the additional \$35 million with the 25% "haircut").
- Modeling assumes North Slope tax treatment.

Field Lifecycle Modeling: Introduction

Lifecycle Modeling Assumptions

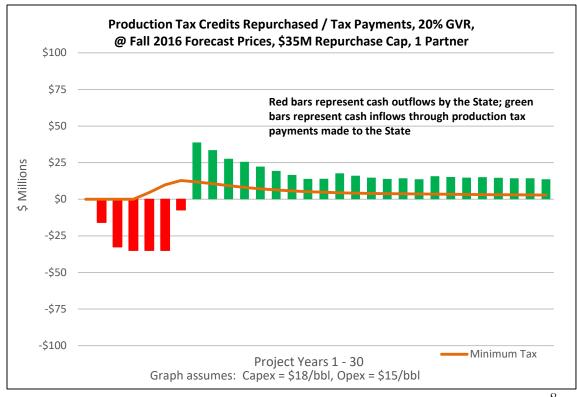
- Field Sizes Modeled:
 - 50 million barrels of oil (mmbo) field
 - 750 mmbo field
- Four Oil Prices Modeled:
 - \$40, \$60, and \$80 real (inflated)
 - Fall 2016 Forecast prices in real prices extending through life of field
- Tax Systems Modeled:
 - Status Quo
 - All Provisions
 - 1 and 4 Partner Scenarios (impacts total cash repurchase per year)
 - HB111

Lifecycle Modeling Outputs

- Each Scenario has a Dashboard with Four Quadrants
 - 1. Production Tax
 - 2. State Revenue
 - 3. Producer Revenue
 - 4. Summary Economics
 - a. Total Cash Flows
 - b. NPV Analysis
 - c. Split of Profits
 - d. Split of Gross

Dashboard - Net Production Tax

- Credits Repurchased by State
- Production Tax Paid
- Minimum Tax Calculation



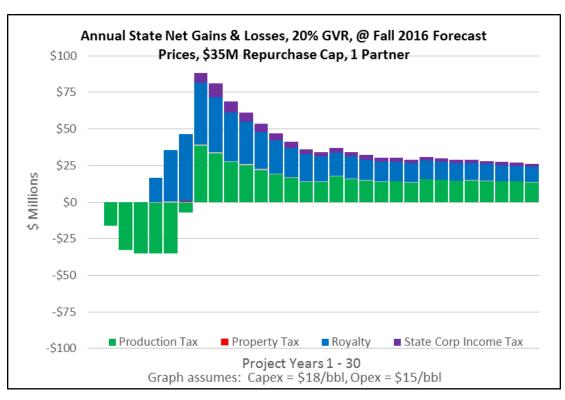
Dashboard – State Gains & Losses

State Revenue

Production Tax (negative numbers are credits repurchased

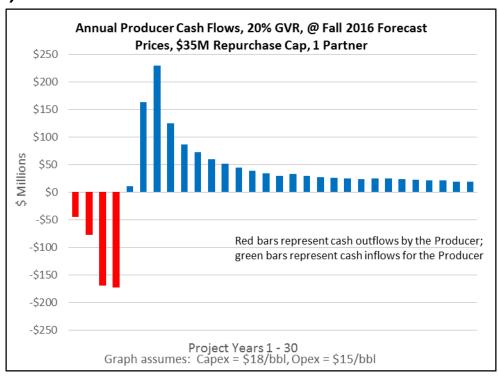
Royalties

- State Share of Property Tax
- State Corp Income Tax



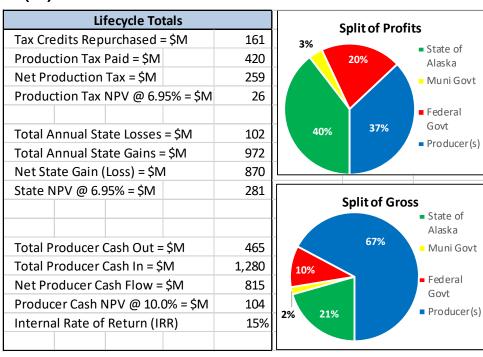
Dashboard - Producer(s) Cash Flows

- Producer(s) Cash Outflows
 - Period when net cash is negative (typically when haven't started production and have huge cash outflows).
- Producer(s)
 Cash Inflows
 - Period when net cash is positive



Dashboard – Summary Economics

- Total Credits
- Total State and Producer Cash Flows
- Lifecycle Totals
 - Net Present Value (NPV) of discounted cash flows for State and Producer(s).
- Split of Profits
 - By entity
- Split of Gross (wellhead value)
 - By Entity



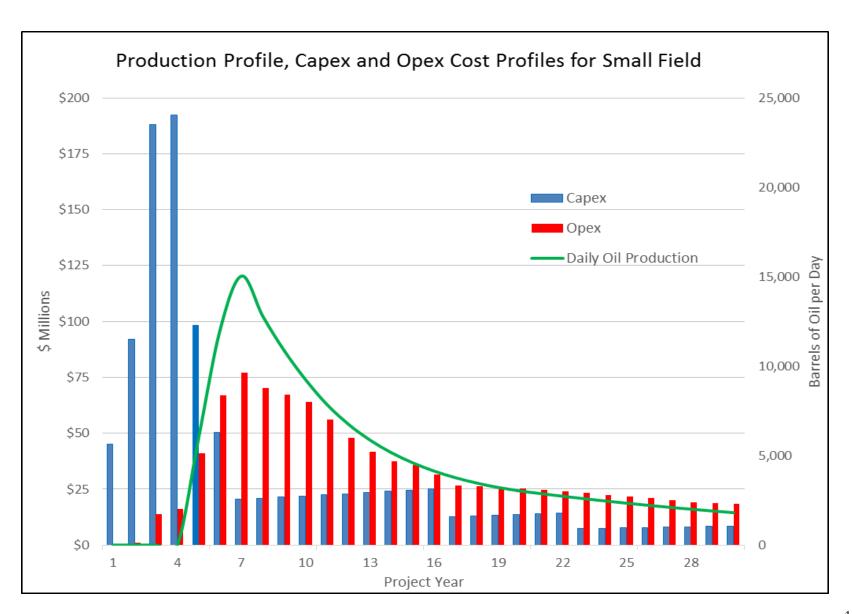
Field Lifecycle Modeling: North Slope Small Field

Lifecycle Modeling Assumptions – Small Field

50 mmbo Field Assumptions

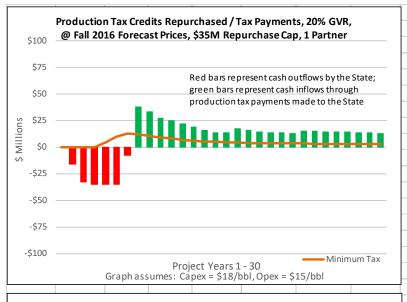
- Life of Field = 30 Years
- Peak Oil Production = ~15,000 bbls/day
- Transportation Cost = \$10 / bbl
- Royalty Rate = 12.5% (all State)
- Capex \$ = \$18 / bbl
- Opex \$ = \$15 / bbl
- Property Tax Rate = \$1.25 / bbl
- State Corp Income Tax Rate = 6.5% of remaining Production Tax Value (PTV) after Production Tax is paid
- Federal Corp Income Tax Rate = 35% of remaining PTV after State Corp Income Tax is paid

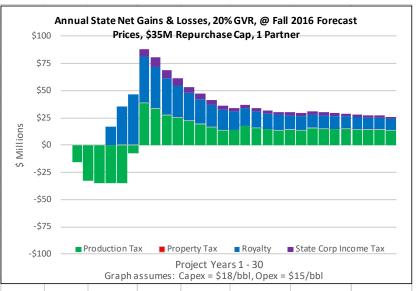
Profile Curves – Small Field

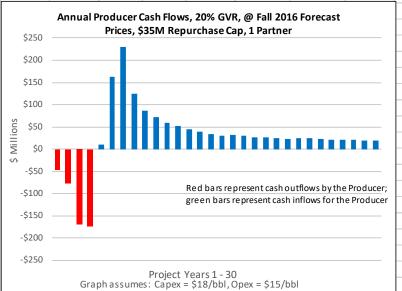


Lifecycle Modeling – Small Field

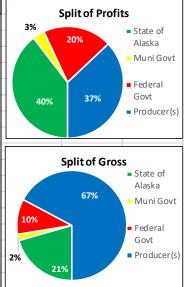
50 mmbo, Status Quo, Fall 2016 Forecast Prices, 1 Partner





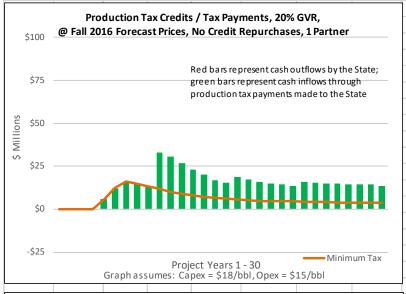


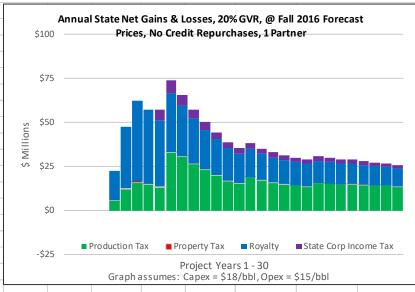
Lifecycle To	tals			
Tax Credits Repurchased	161			
Production Tax Paid = \$M	420			
Net Production Tax = \$M	259			
Production Tax NPV @ 6.9	95% = \$M	26		
Total Annual State Losses	= \$M	102		
Total Annual State Gains :	972			
Net State Gain (Loss) = \$N	870			
State NPV @ 6.95% = \$M	281			
Total Producer Cash Out =	= \$M	465		
Total Producer Cash In = \$	1,280			
Net Producer Cash Flow =	815			
Producer Cash NPV @ 10.	104			
Internal Rate of Return (II	RR)	15%		



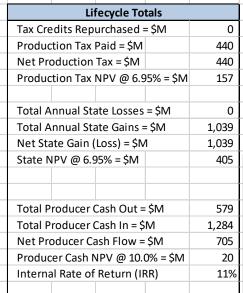
Lifecycle Modeling – Small Field

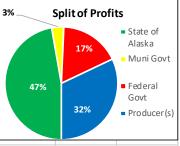
50 mmbo, HB111, Fall 2016 Forecast Prices, 1 Partner

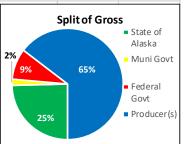




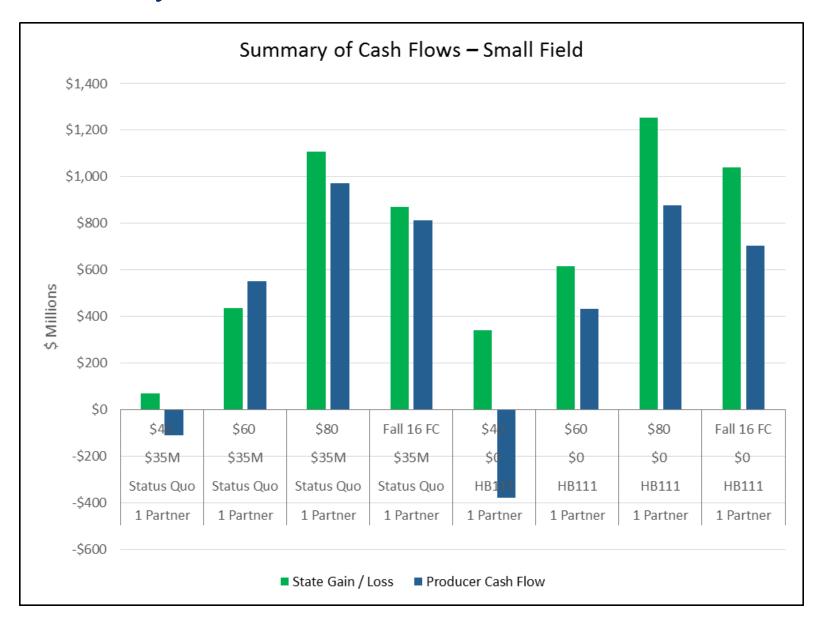
\$250	Annual Producer Cash Flows, 20% GVR, @ Fall 2016 Forecast Prices, No Credit Repurchases, 1 Partner
\$200	
\$150	
\$100	
SU \$50	
\$50 Similion \$0	11111
-\$50	<u> </u>
-\$100	Red bars represent cash outflows by the Producer;
-\$150	green bars represent cash inflows for the Producer
-\$200	
-\$250	
	Project Years 1 - 30 Graph assumes: Capex = \$18/bbl, Opex = \$15/bbl







Summary Table – Small Field



Summary Table – Small Field

Field						Net	Productio	Net State				
Size			Credit		Credits	Productio	n Tax NPV	Gain	State NPV	Producer	Producer	
(million	#	Tax	Repurchase		Repurchased	n Tax Paid	6.95%	(Loss)	6.95%	Cash Flow	NPV 10.0%	Producer
bbl)	Partners	Regime	Limit	Oil Price	(\$millions)	IRR (%)						
50	1	Status Quo	\$35M	\$40	219	(183)	(145)	71	(36)	(109)	(217)	-3%
50	1	Status Quo	\$35M	\$60	185	(41)	(89)	437	113	550	23	11%
50	1	Status Quo	\$35M	\$80	153	420	99	1,108	390	972	170	18%
50	1	Status Quo	\$35M	Fall 16 FC	161	259	26	870	281	815	104	15%
50	1	HB111	0	\$40	0	87	37	341	147	(378)	(374)	-7%
50	1	HB111	0	\$60	0	152	63	618	257	433	(78)	7%
50	1	HB111	0	\$80	0	575	213	1,253	499	878	96	14%
50	1	HB111	0	Fall 16 FC	0	440	157	1,039	405	705	20	11%

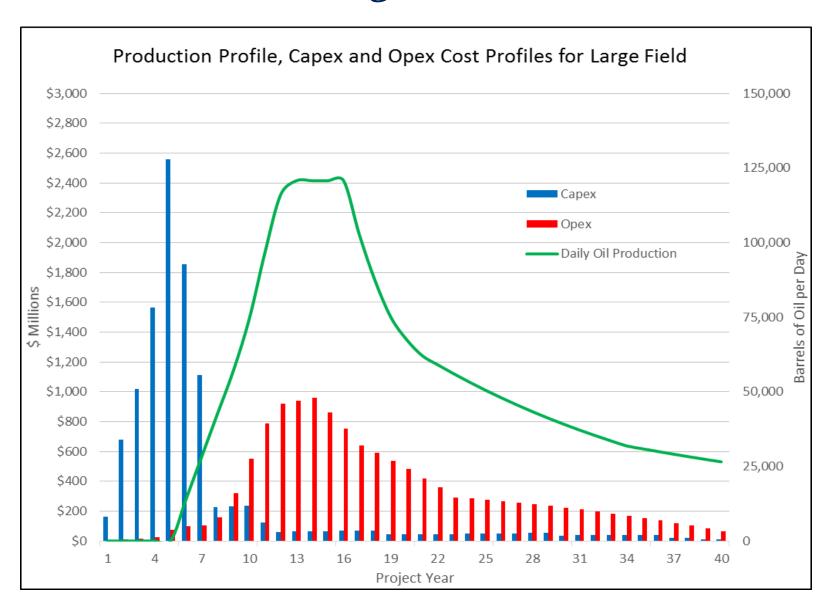
Field Lifecycle Modeling: North Slope Large Field

Lifecycle Modeling Assumptions – Large Field

750 mmbo Field Assumptions

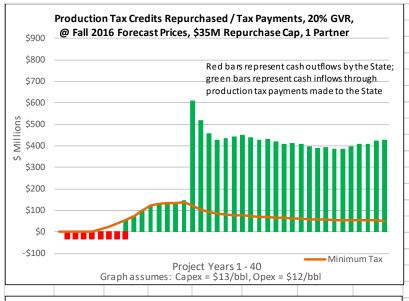
- Life of Field = 40 Years
- Peak Oil Production = ~120,000 bbls/day
- Transportation Cost = \$10 / bbl
- Royalty Rate = 12.5% (all State)
- Capex \$ = \$13 / bbl
- Opex \$ = \$12 / bbl
- Property Tax Rate = \$1.25 / bbl
- State Corp Income Tax Rate = 6.5% of remaining
 Production Tax Value (PTV) after Production Tax is paid
- Federal Corp Income Tax Rate = 35% of remaining PTV after State Corp Income Tax is paid

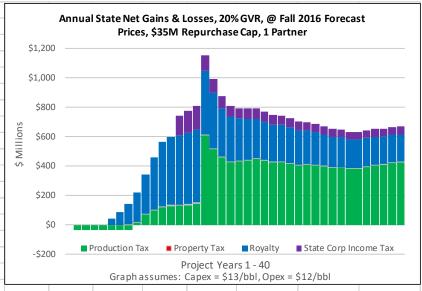
Profile Curves – Large Field

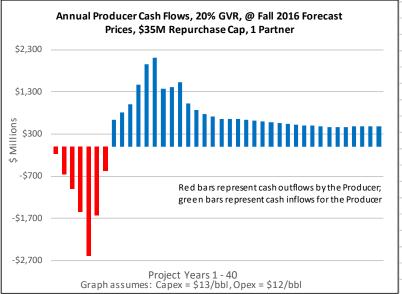


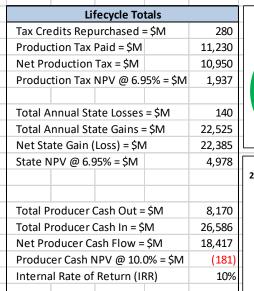
Lifecycle Modeling – Large Field

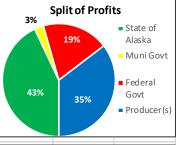
750 mmbo, Status Quo, Fall 2016 Forecast Prices, 1 Partner

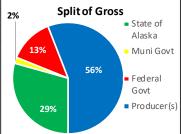






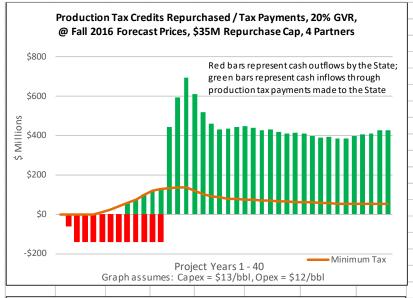


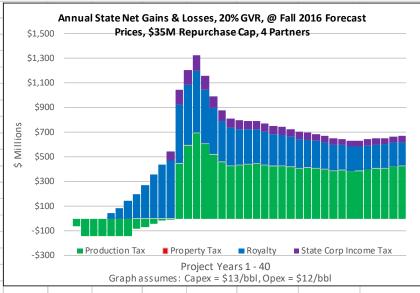


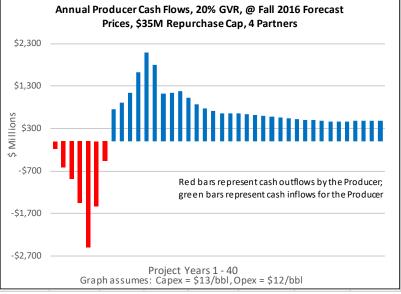


Lifecycle Modeling – Large Field

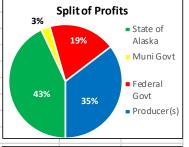
750 mmbo, Status Quo, Fall 2016 Forecast Prices, 4 Partners

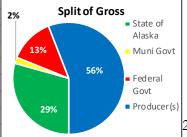






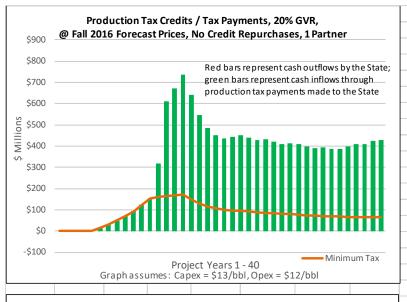
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	Lifecycle Totals			
	Tax Credits Repurchased = \$M	1,600		
	Production Tax Paid = \$M	12,549		
	Net Production Tax = \$M	10,950		
	Production Tax NPV @ 6.95% = \$M	1,638		
	Total Annual State Losses = \$M	629		
	Total Annual State Gains = \$M	23,014		
	Net State Gain (Loss) = \$M	22,385		
	State NPV @ 6.95% = \$M	4,683		
	Total Producer Cash Out = \$M	7,620		
	Total Producer Cash In = \$M	26,037		
	Net Producer Cash Flow = \$M	18,417		
	Producer Cash NPV @ 10.0% = \$M	112		
	Internal Rate of Return (IRR)	10%		

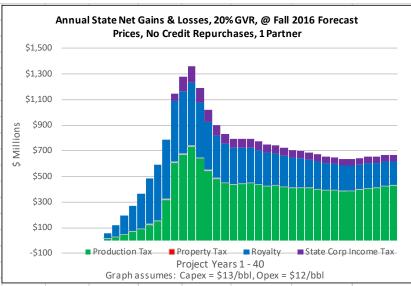


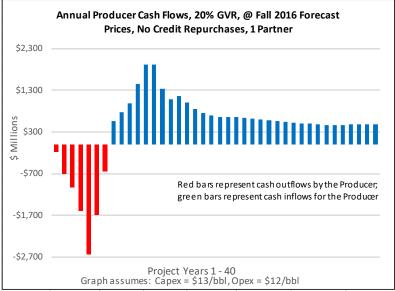


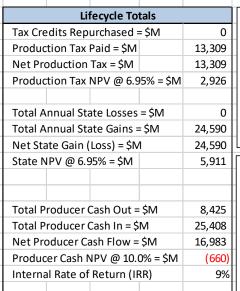
Lifecycle Modeling – Large Field

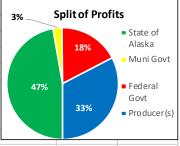
750 mmbo, HB111, Fall 2016 Forecast Prices, 1 or 4 Partners

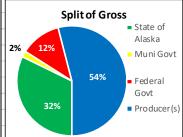




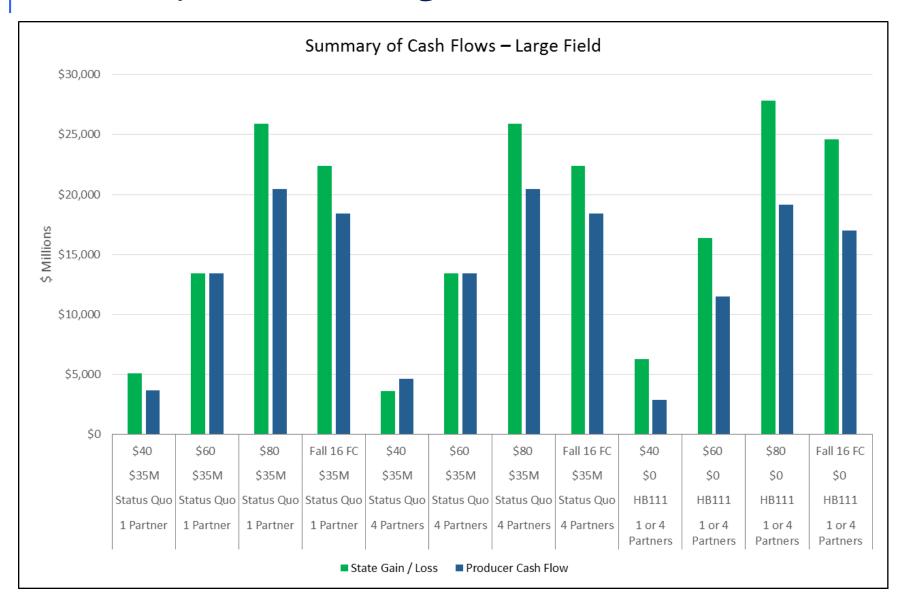








Summary Table – Large Field



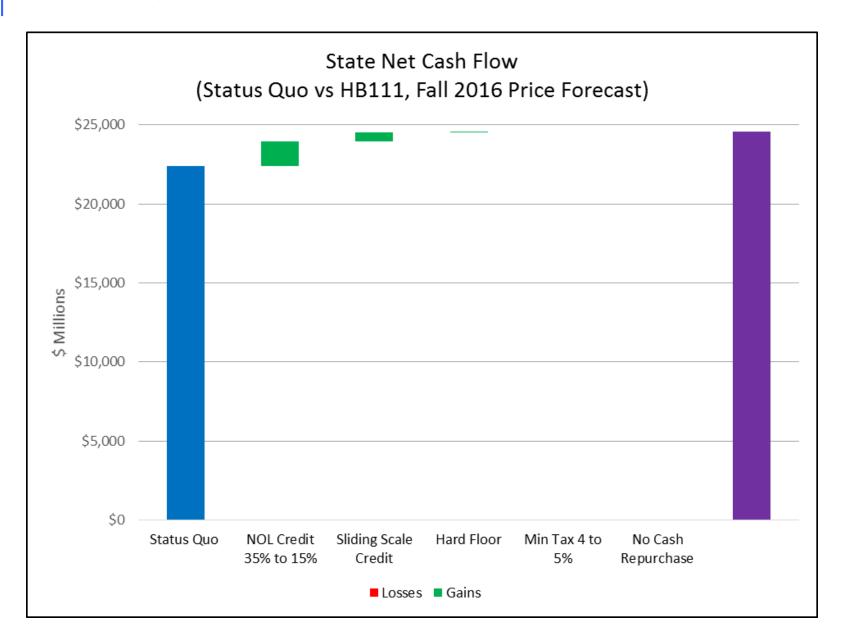
Summary Table – Large Field

Field Size			Credit		Credits	Net Production	Production Tax NPV	Net State Gain	State NPV	Producer	Producer	
(million	#	Tax	Repurchase		Repurchased	Tax Paid	6.95%	(Loss)	6.95%	Cash Flow	NPV 10.0%	Producer
bbl)	Partners	Regime	Limit	Oil Price	(\$millions)	(\$millions)	(\$millions)	(\$millions)	(\$millions)	(\$millions)	(\$millions)	IRR (%)
750	1	Status Quo	\$35M	\$40	770	250	(15)	5,116	1,260	3,679	(3,787)	2%
750	1	Status Quo	\$35M	\$60	280	4,596	596	13,412	2,917	13,414	(1,360)	7%
750	1	Status Quo	\$35M	\$80	280	13,415	2,546	25,891	5,883	20,430	296	11%
750	1	Status Quo	\$35M	Fall 16 FC	280	10,950	1,937	22,385	4,978	18,417	(181)	10%
750	4	Status Quo	\$35M	\$40	3,065	(1,351)	(1,094)	3,620	208	4,652	(3,034)	3%
750	4	Status Quo	\$35M	\$60	2,020	4,596	73	13,412	2,409	13,414	(926)	8%
750	4	Status Quo	\$35M	\$80	1,460	13,415	2,287	25,891	5,626	20,430	564	11%
750	4	Status Quo	\$35M	Fall 16 FC	1,600	10,950	1,638	22,385	4,683	18,417	112	10%
750	1 or 4	HB111	0	\$40	0	1,527	421	6,310	1,686	2,903	(4,082)	2%
750	1 or 4	HB111	0	\$60	0	7,776	1,580	16,386	3,848	11,481	(1,814)	6%
750	1 or 4	HB111	0	\$80	0	15,515	3,487	27,854	6,770	19,153	(168)	10%
750	1 or 4	HB111	0	Fall 16 FC	0	13,309	2,926	24,590	5,911	16,983	(660)	9%

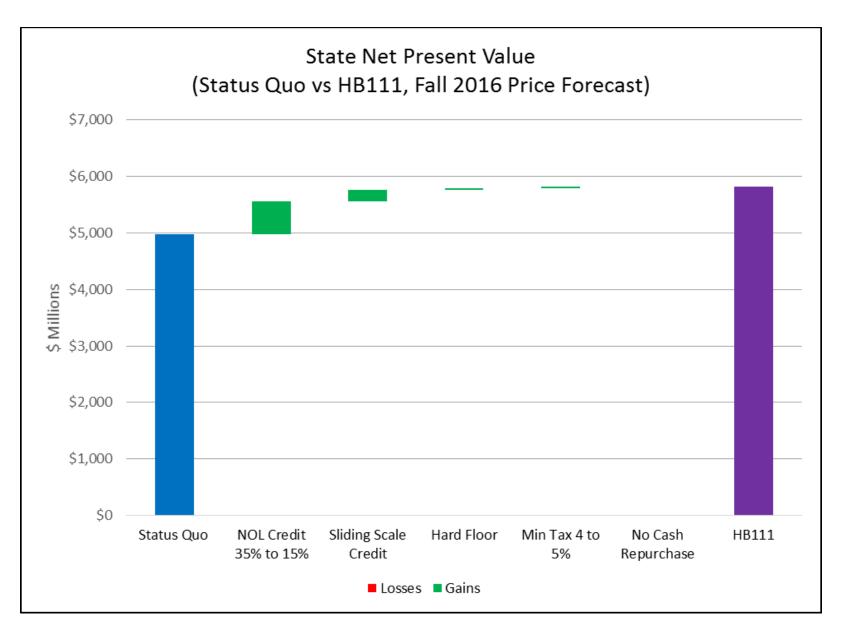
Further Analysis – Large Field

- What's Driving the Changes from Status Quo by Tax Component Change
 - Compared Two Scenarios
 - 2016 Fall Forecast Prices
 - 1 Partner Scenario vs HB111
 - Five Components to Tax Change
 - NOLs reduced from 35% to 15%
 - Sliding Scale Credits reduced from maximum of \$8/bbl to \$5/bbl
 - Hardened the Floor
 - Minimum Tax increased from 4% to 5%
 - Cash Repurchases Eliminated for North Slope

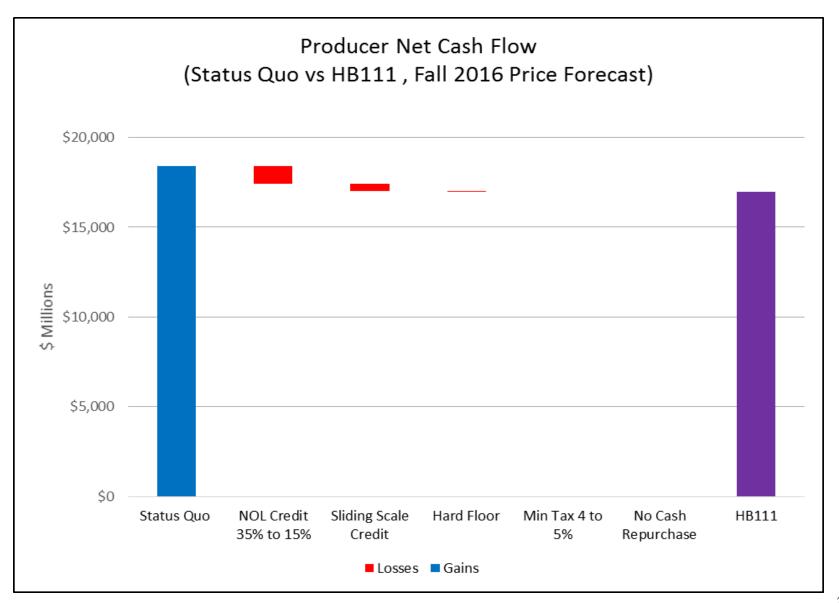
Status Quo vs HB111 – State Net Cash Flows



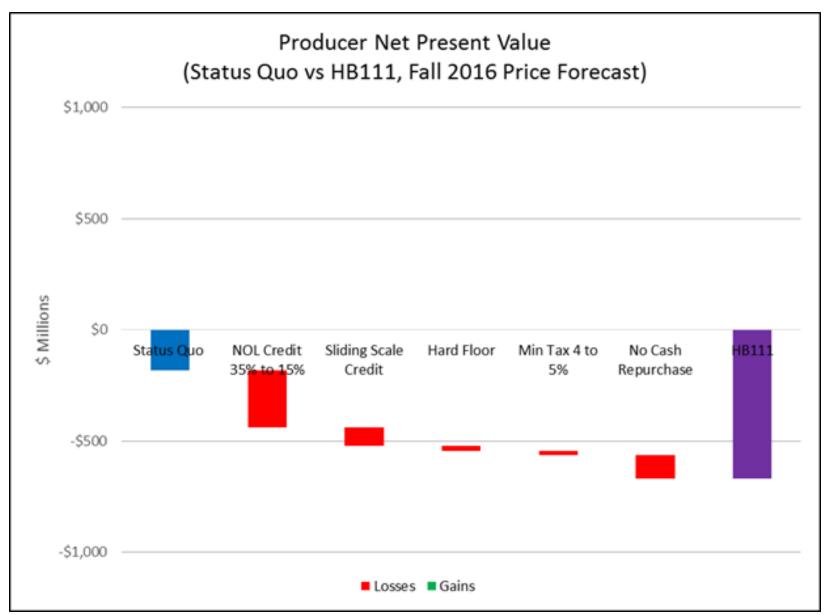
Status Quo vs HB111 – State Net Present Value



Status Quo vs HB111 – Producer Net Cash Flows



Status Quo vs HB111 - Producer Net Present Value





Thank You!

Contact Information

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