

Pulling Together to Build Our Future

Alaska's Oil and Gas Taxation – CSHB 111(RES)\N

Lifecycle Scenario Analysis Presentation to House Finance Committee Colleen Glover, Tax Division Commercial Analyst Alaska Department of Revenue



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What Will Be Presented Today

- Summary of CSHB 111(RES)\N 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\N changes on new North Slope fields.

What are the Major Tax Changes in HB 111\N

	Status Quo	HB111\N		
Net Operating Loss (NOL) Provisions				
NOL Credit %	35%	0%		
GVR can make NOL larger	no	no		
NOL Carry Forward Loss	no	50%		
NOL Loss Uplifts (7 yrs @ 7% + Fed Rate)	no	yes		
Per Taxable Barrel Credit Provisions (based on We	ellhead Value)			
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, \$3-\$8 / 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 % Rate based on ANS Price	4% =>\$25	4% <\$50, 5% =>\$50		
Non-GVR Min Tax based on of Gross Value	yes	yes		
GVR Min Tax based on Gross Value less GVR	no	yes		
Minimum Tax Floor (Hardening the Floor)				
NOL credits against Min Tax	yes	no		
GVR per barrel credits against Min Tax	yes	no		
Non-GVR Sliding scale credits against Min Tax	no	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 go 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
 - o All Provisions
 - 1 and 4 Partner Scenarios (impacts total cash repurchase per year)
 - HB111\N

Lifecycle Modeling Outputs

- Each Scenario has a Dashboard with Four Quadrants
 - 1. Production Tax by year
 - 2. State Revenue by year
 - 3. Producer Revenue by year
 - 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)
- Capital Expenditures (Capex) \$ = \$18 / bbl
- Operating Expenditures (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 (GVR @ 20%) 50 mmbo, Status Quo, Fall 2016 Forecast Prices, 1 Partner



Lifecycle Modeling – Small Field (GVR @ 20%) 50 mmbo, HB111\N, Fall 2016 Forecast Prices, 1 Partner



Summary Table – Small Field

Field						Net	Production	Net State				
Size			Credit		Credits	Production	Tax NPV	Gain	State NPV	Producer	Producer	
(million	#	Тах	Repurchase		Repurchase	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/N	0	\$40	0	72	29	326	138	(363)	(367)	-7%
50	1	HB111/N	0	\$60	0	197	69	659	263	406	(78)	7%
50	1	HB111/N	0	\$80	0	645	241	1,318	525	836	84	13%
50	1	HB111/N	0	Fall 16 FC	0	487	173	1,083	420	677	13	11%

Summary Results – Small Field



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 (GVR @ 20%) 750 mmbo, Status Quo, Fall 2016 Forecast Prices, 1 Partner



Lifecycle Modeling – Large Field (GVR @ 20%) 750 mmbo, Status Quo, Fall 2016 Forecast Prices, 4 Partners



Lifecycle Modeling – Large Field (GVR @ 20%) 750 mmbo, HB111\N, Fall 2016 Forecast Prices, 1 or 4 Partners



Lifecycle Modeling – Large Field (GVR @ 30%) 750 mmbo, Status Quo, Fall 2016 Forecast Prices, 4 Partners



Lifecycle Modeling – Large Field (GVR @ 30%) 750 mmbo, HB111\N, Fall 2016 Forecast Prices, 1 or 4 Partners



Summary Table – Large Field

							Net	Production	Net State				
Field Size				Credit		Credits	Production	Tax NPV	Gain	State NPV	Producer	Producer	
(million	#	Тах		Repurchase		Repurchased	Tax Paid	6.95%	(Loss)	6.95%	Cash Flow	NPV 10.0%	Producer
bbl)	Partners	Regime	GVR %	Limit	Oil Price	(\$millions)	IRR (%)						
750	1	Status Quo	20%	\$35M	\$40	770	250	(15)	5,116	1,260	3,679	(3,787)	2%
750	1	Status Quo	20%	\$35M	\$60	280	4,596	596	13,412	2,917	13,414	(1,360)	7%
750	1	Status Quo	20%	\$35M	\$80	280	13,415	2,546	25,891	5,883	20,430	296	11%
750	1	Status Quo	20%	\$35M	Fall 16 FC	280	10,950	1,937	22,385	4,978	18,417	(181)	10%
750	4	Status Quo	20%	\$35M	\$40	3,065	(1,351)	(1,094)	3,620	208	4,652	(3,034)	3%
750	4	Status Quo	20%	\$35M	\$60	2,020	4,596	73	13,412	2,409	13,414	(926)	8%
750	4	Status Quo	20%	\$35M	\$80	1,460	13,415	2,287	25,891	5,626	20,430	564	11%
750	4	Status Quo	20%	\$35M	Fall 16 FC	1,600	10,950	1,638	22,385	4,683	18,417	112	10%
750	4	Status Quo	30%	\$35M	Fall 16 FC	1,600	9,990	1,397	24,406	5,264	17,103	(148)	10%
750	1 or 4	HB111/N	20%	0	\$40	0	2,046	432	6,796	1,694	2,587	(4,064)	1%
750	1 or 4	HB111/N	20%	0	\$60	0	8,081	1,615	16,671	3,879	11,295	(1,819)	6%
750	1 or 4	HB111/N	20%	0	\$80	0	16,388	3,681	28,670	6,950	18,623	(230)	10%
750	1 or 4	HB111/N	20%	0	Fall 16 FC	0	14,136	3,100	25,364	6,073	16,480	(717)	9%
750	1 or 4	HB111/N	30%	0	Fall 16 FC	0	13,025	2,798	27,244	6,597	15,258	(953)	8%

Note: Gray shaded lines are those GVR fields with royalty > 12.5% so qualify for 30% GVR instead of 20% when royalty = 12/5%

Summary Results – Large Field



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\N
 - Five Components to Tax Change
 - Net Operating Losses (NOLs) changed from 35% credit to 50% carry forward loss
 - Sliding Scale Credits shifted from maximum of \$8/bbl @
 <\$80 Wellhead value to \$6/bbl @ <\$60 Wellhead value
 - Hardened the Floor
 - Minimum Tax increased from 4% to 5% @ \$50 ANS \$
 - 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





Pulling Together to Build Our Future

Thank You!

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