



PRESENTS THE
8TH ANNUAL DENNEY L. WRIGHT INTERNATIONAL ENERGY TAX CONFERENCE
AND
26TH ANNUAL HOUSTON BUSINESS AND TAX LAW JOURNAL SYMPOSIUM



Big Beautiful International Energy Investment

Friday, February 27, 2026

10:00 AM – 5:00 PM Central | Conference

5:00 – 6:00 PM Central | Reception

In Person and Virtual



*Approved for 6.5 hours of Texas MCLE credit
Texas CPE credit available for public accountants attending in person*

John M. O'Quinn Law Building
Danny M. Sheena Courtroom
4170 Martin Luther King Blvd.
Houston, Texas 77204

AGENDA

Introductions	
Denney Wright	Professor of Practice, University of Houston Law Center Lecturer, Bauer College of Business, University of Houston
Sean Phoebus	Editor-in-Chief, <i>Houston Business and Tax Law Journal</i> , University of Houston Law Center
Turab Abbas	Events Editor, <i>Houston Business and Tax Law Journal</i> , University of Houston Law Center
10:00 – 10:45 am	U.S. One Big Beautiful Bill Act Highlights for Domestic Taxation .75
Jeff Romero - Moderator	Partner, Tax, Skadden, Arps, Slate, Meagher & Flom LLP, Houston
Terry Coleman	Manager, Transaction Tax Advisory, Ernst & Young, Houston
Ali Foyt	Tax Counsel, Cheniere Energy, Inc., Houston
Amit Sachdeva	Partner, Transaction Tax Advisory, Ernst & Young, Houston
10:45 – 11:45 am	U.S. One Big Beautiful Bill Act Highlights for International Taxation 1.0
Bret Wells - Moderator	John Mixon Chair & Professor of Law, University of Houston Law Center
Patrick Martin	Shareholder, Chamberlain Hrdlicka, San Antonio
11:45 am – 12:45 pm	U.S. One Big Beautiful Bill Act Highlights for Energy/Credits 1.0
John R. Lehrer II - Moderator	Partner, BakerHostetler, Washington, D.C.
Barbara de Marigny	Partner, Baker Botts, Houston
Kelsey Latham	WNT Senior Manager, KPMG LLP, Houston
Jenny Speck	Partner, Tax, Vinson & Elkins LLP, Houston
12:45 – 1:15 pm	Break / Pick up Box Lunches

*Attorneys may self-report their hours commensurate with the time in attendance using the course number or QR code provided at the conference. The amount of credit per panel is listed in the agenda. If you are licensed in another jurisdiction and require an out-of-state certificate to pursue credit, please email Kristina Van Arsdel at kgvanars@central.uh.edu.

**Texas CPE credit is available for public accountants attending in person who sign in with their CPA License Number at Check In.

AGENDA

1:15 – 2:15 pm

Better Late Than Never: The AIEN Model Host Government Agreement Is On Its Way! 1.0

Sarah Buhulaiyem
- Moderator

University of Houston Law Center 3L, Alternate Co-Chair, AIEN Model Host Government Agreement Drafting Committee

John Bridges

Energy Industry Consultant, Former AIEN Executive Director

Luís Miranda

Of Counsel, Miranda Alliance, Houston

Norman Nadorff

Special Counsel, Mayer Brown, Houston/Rio de Janeiro - Adjunct Professor, University of Houston Law Center - Co-Chair, AIEN Model Host Government Agreement Drafting Committee

2:15 – 3:15 pm

Energy Dispute Resolution Challenges – If This Went to Trial (or Before a Neutral): What Corporate Lawyers Should Know

1.0

Andrew Wright
- Moderator

Partner, Buck Keenan LLP, Houston

Imad Khan

Partner, Winston & Strawn LLP, Houston

Gary McGowan

McGowan Arbitration and Dispute Resolution, Houston

Alexander K. Obrecht

Partner, BakerHostetler, Denver

Ann Ryan Robertson

Independent Arbitrator, Ann Ryan Robertson PLLC, Houston

Andrew Zeve

Partner, White & Case LLP, Houston

3:15 – 4:15 pm

Sanctions and Tariffs

1.0

Julian Cardenas
- Moderator

Research Assistant Professor and Director, Center for U.S. and Mexican Law, University of Houston Law Center

Eric Cassidy

Partner, Curtis, Mallet-Provost, Colt & Mosle LLP, Houston

Bryan Schillinger

Managing Director, Global Trade, Ernst & Young, Houston

4:15 – 5:00 pm

Comparative Discussion of Tax Reforms and Tariffs Challenging Energy Investments in Canada and Mexico

.75

Dan Jankovic
- Moderator

Partner, Blake, Cassels & Graydon LLP, Calgary, Canada

Tayler Amatto

Associate Principal, Charles River Associates, Calgary, Canada

Mario Barrera

Tax Partner, Clark Hill, Mexico City, Mexico

Andrea Iturbide

Associate, Clark Hill, Mexico City, Mexico

Benjamín Torres-Barrón

Partner, Baker & McKenzie Abogados, S.C., Mexico City, Mexico

5:00 – 6:00 pm

Reception in the Foundation Room

BIOGRAPHIES



TAYLER AMATTO

*Associate Principal
Charles River Associates
Calgary, Canada*

Tayler Amatto is an associate principal in Charles River Associates' Energy Practice located in Calgary, where she advises clients on investment strategy, energy market participation, and long-term planning across North American electricity and fuel markets.

With a background in both consulting and private equity, Amatto brings over a decade of experience helping utilities, developers, and public sector agencies navigate market reform, deploy capital, and integrate large-scale energy loads. Her work is grounded in techno-economic analysis, resource adequacy planning, and commercial strategy development for emerging energy technologies.



MARIO BARRERA

*Tax Partner, Clark Hill
Mexico City, Mexico*

Mario Barrera focuses his practice on domestic and cross-border tax advisory, planning, and strategy. He represents clients before tax authorities in procedures such as tax examinations, administrative appeals, settlements, and mutual agreement procedures. Mario also has broad experience handling tax treaties, transfer pricing matters, and corporate reorganizations.

In addition, Mario has authored numerous papers for specialized journals, including Tax Notes International, Puntos Finos, IDC, and Practical Mexican Tax Strategies, and is a frequent speaker and lecturer on tax law.



JOHN BRIDGES

*Energy Industry Consultant
Former AIEN Executive Director*

John Bridges is an energy industry consultant and the former Executive Director of the Association of International Energy Negotiators, an independent not-for-profit professional membership association that supports international energy negotiators around the world and enhances their effectiveness and professionalism in the international energy community. His extensive career in the oil and gas industry has encompassed leadership roles in exploration, production, and operations in multiple U.S. locations from Texas to Alaska, and international roles including explorations, negotiations, and business development in SE Asia, Africa, and Europe.

Bridges began his career with Atlantic Richfield Company (ARCO). His experiences included working in the Anaconda mining division in Denver and then moving into Oil and Gas in Bakersfield and Midland; following this, he spent seven years in Alaska working at Prudhoe Bay and Alpine, as well as exploration in the National Petroleum Reserve and North Slope Foothills area.

BIOGRAPHIES



SARAH BUHULAIYEM

*University of Houston Law Center 3L
Alternate Co-Chair, AIEN Model Host Government Agreement Drafting Committee*

Sarah Buhulaiyem is a third-year law student at the University of Houston Law Center. She is an alternate co-chair of the AIEN Model Host Government Agreement Drafting Committee. She obtained her Bachelor of Arts in Government and her Bachelor of Science in Public Relations from the University of Texas at Austin. After spending her 1L and 2L summers at Mayer Brown, she will join the firm as an Associate Attorney in the Corporate & Securities practice following graduation and bar passage.



JULIAN CARDENAS GARCIA

*Research Assistant Professor
Director, Center for U.S. and Mexican Law
University of Houston Law Center*

Julian Cardenas Garcia is a research assistant professor in the Environment, Energy & Natural Resources Center at the University of Houston Law Center and is Director of the UHLC Center for U.S. and Mexican Law. He specializes in International Oil and Gas Law and Latin American issues with a particular focus on Venezuela. Cardenas Garcia is fluent in English, Spanish, and French.



ERIC CASSIDY

*Partner
Curtis, Mallet-Provost, Colt & Mosle LLP
Houston*

Eric Cassidy is an experienced commercial litigation and international arbitration lawyer. He is recognized by Thomson Reuters as a litigator in the top 5% of business trial lawyers in Houston. Cassidy frequently represents clients in the energy, oil and gas, and tech sectors, as well as corporations and high-net-worth individuals, in complex commercial disputes, including energy litigation, business litigation, international arbitration, construction, fraud, and white-collar defense.



TERRY COLEMAN

*Manager, Transaction Tax Advisory
Ernst & Young
Houston*

Terry is a Manager in EY's Houston office in the Transaction Tax Advisory group, where he focuses on US federal income tax due diligence, planning, and structuring for business transactions for both corporations and partnerships. He has experience providing tax planning and other transaction advisory services in domestic and cross-border transactions to corporate and private equity clients in industries including energy, construction, manufacturing, and retail, among others on both the buy-side and sell-side. Prior to his time at EY, he worked as a Senior in the SALT and Mergers & Acquisitions Tax groups at Deloitte. He received his JD from the University of Houston Law Center and his Master of Laws (LLM) in Taxation from New York University School of Law.

BIOGRAPHIES



BARBARA DE MARIGNY

*Partner, Baker Botts
Houston*

Barbara focuses her practice on tax structuring for transactions, with a particular emphasis on federal income tax issues arising in partnership, joint venture and alternative investment structures, including the use of partnership structures for strategic acquisitions by corporate groups, in IPOs, securities offerings and for tax equity financing.

Her practice has an energy industry concentration, including transactions involving Fortune 50 corporations, master limited partnerships (MLPs), private equity investors and portfolio companies in all aspects of the energy industry, upstream, midstream, and downstream, oil field services and petrochemicals. Barbara has a particular focus on the taxation of climate and clean energy initiatives, such as the section 45Q federal tax credit for carbon capture, use and sequestration (“CCUS”), tax incentives for hydrogen energy, alternative fuel vehicles and carbon pricing proposals. She is a frequent speaker and author on section 45Q topics, including the provision of comments and testimony to the IRS on the proposed regulations and regularly advises clients on credit-maximizing structures.

Additionally, she is board certified in tax law by the Texas Board of Legal Specialization. Barbara has been the Chair of the Partnership and LLC Tax Committee of the ABA Section of Taxation, is a recipient of the committee’s Larry M. Katz Award for Distinguished Service for 2009 and was the founder and first Chair of the Section’s LLC Task Force.



ALI FOYT

*Tax Counsel
Cheniere Energy, Inc.
Houston*

Ali Foyt advises and represents Cheniere Energy, Inc. on a broad range of tax planning and controversy matters. In this role she has developed specialization in tax planning for project development, policy engagement on industry-specific issues, and contract structuring for trade compliance and tariff mitigation strategies. After graduating from UHLC and prior to joining Cheniere, Ali was an associate at Baker Botts LLP where she focused on state tax issues.



ANDREA ITURBIDE

*Associate, Clark Hill
Mexico City, Mexico*

Andrea Iturbide focuses her practice on a variety of tax matters. Andrea advises clients on tax compliance, planning and strategy, as well as representing them in disputes with tax authorities. With a strong foundation in consulting and litigation, she is committed to delivering precise, client-focused solutions that align with regulatory requirements and business objectives. She also helps taxpayers learn to comply with legal tax provisions, support their transactions, and prepare for and avoid future contingencies.

Andrea represents clients before local and federal tax authorities with regard to tax assessments, audits, administrative appeals, settlements and mutual agreement procedures. She is also experienced in negotiating between the tax authority and taxpayers before the PRODECON (Mexican Taxpayers’ Ombudsman). In addition, Andrea has earned a certificate in Constitutional Challenges from Mexico’s Supreme Court of Justice.

BIOGRAPHIES



DAN JANKOVIC

*Partner, Blake, Cassels & Graydon LLP
Calgary, Canada*

Dan Jankovic practices corporate income tax law and advises on domestic and international tax planning matters, with a particular focus on M&A, corporate reorganizations, financings, debt restructurings, resource taxation, “clean energy” investment tax credits and investments by private equity and pension funds. He also advises international clients looking to invest, commence or acquire business operations in Canada, especially in the oil and gas, renewables and emerging energy, technology, infrastructure, and service industry sectors. He has provided structuring advice in respect of numerous complex and customized joint venture and partnership arrangements. Dan has a keen interest in the current transformation of the energy sector and is active in assisting clients with the challenges and opportunities presented by the energy transformation, particularly in the areas of hydrogen, clean technology and electricity and Carbon Capture, Usage and Storage.



IMAD KHAN

*Partner, Winston & Strawn LLP
Houston*

Imad is an international disputes lawyer who represents and advises sovereigns, multinational companies, state-owned entities, and intergovernmental organizations through all aspects of international dispute resolution. He is particularly experienced in investment treaty and international commercial arbitration under all major arbitral rules, including the ICC, ICDR, AAAN, HKIAC, LCIA, ICSID, and UNCITRAL. His practice includes enforcement of foreign judgments and arbitral awards. He frequently publishes articles and lectures on topics related to international arbitration and dispute resolution and serves in leadership of international organizations and arbitral institutions.



KELSEY LATHAM

WNT Senior Manager, KPMG LLP, Houston

Kelsey is a member of KPMG’s Washington National Tax (WNT) group, where she advises clients on federal tax credits and incentives enacted under the Inflation Reduction Act of 2022. Prior to joining WNT, she spent more than five years in the firm’s National Accounting Methods and Credit Services group, helping clients improve tax efficiency and compliance through accounting method changes and credit studies.

In her role with WNT, Kelsey researches and advises on complex technical issues related to energy-related credits and incentives. Her experience spans a wide range of technologies incentivized or expanded under the Inflation Reduction Act, including wind, solar, clean fuels, carbon capture, hydrogen production, and other renewable and clean energy initiatives. She has also been actively involved in interpreting and implementing the prohibited foreign entity rules introduced under the One Big Beautiful Bill Act.



JOHN R. LEHRER II

*Partner, BakerHostetler
Washington, DC*

John Lehrer serves as the Tax Group Leader for the D.C. office of BakerHostetler LLP. He regularly provides domestic and international federal income tax advice on a wide variety of topics, including M&A structuring, bankruptcy planning, and tax loss and credit planning to taxpayers around the world in the energy sector and outside of the energy sector. Lehrer also previously served as in-house counsel for an international energy management and consulting company that was responsible for the development of synthetic fuel manufacturing facilities in connection with tax credits available under IRC Section 29.

BIOGRAPHIES



PATRICK W. MARTIN

*Shareholder, Chamberlain Hrdlicka
San Antonio*

With more than 30 years of legal experience, Patrick Martin's practice focuses on a wide range of international tax issues. He assists domestic and foreign privately held companies, global investors, funds and other business entities with their international tax treaty planning strategies as well as worldwide investments and financing structures. Martin also advises multinational families on issues related to worldwide income, estate, gift, inheritance, and tax withholding planning, as well as international wealth preservation structures. Martin has a wealth of experience in international tax controversies and routinely defends international taxpayers before the relevant tax authorities, including the IRS.

Martin obtained his law degree from the University of San Diego School of Law, where he was the Thomas More Scholar. He also studied international law (Regimen Jurídico de Los Negocios Internacionales en México) at La Escuela Libre de Derecho in Mexico City. He is a prolific writer and speaker, discussing international tax issues. Martin is a Fellow of the American College of Tax Counsel (ACTC) and of the American College of Trust & Estate Counsel (ACTEC). He is also the former chair of the State Bar of California, Taxation Section. Martin also served as an adjunct law professor at the LLM Tax program at the University of San Diego School of Law for several years teaching the LLM course of International Estate Planning.



GARY MCGOWAN

*McGowan Arbitration and Dispute Resolution
Houston*

Gary McGowan of McGowan Arbitration and Dispute Resolution in Houston, Texas, has arbitrated over 200 matters and mediated thousands, many of them arising from contracts in the oil and gas industry. Before becoming a neutral in 1990, he was a founding partner with Susman Godfrey and McGowan, a business litigation firm. He holds a Juris Doctorate from the University of Texas School of Law.



LUÍS MIRANDA

*Of Counsel, Miranda Alliance
Houston*

Luís Miranda started his career in 2008 working in Timor-Leste for an international NGO, where he had the opportunity to participate in the closing of camps for displaced persons and provide legal assistance to local populations in administrative formalities. He then worked for an international law firm in Macao (China), mostly dealing with commercial and litigation matters. Luís then moved to France, where he joined Siemens' legal department in Paris. He was responsible, among other tasks, for advising employees on compliance with a variety of French criminal laws and regulations, assisting in preparing and implementing internal policies on data protection, confidentiality, use of mobile phones, IT and information security, and advising and handling internal employment issues.

In 2012, he joined Miranda & Associados in Lisbon, a leading Portuguese law firm, which heads the Miranda Alliance, an international association of law firms and lawyers with a presence in 16 countries. Luís is currently the Head of Miranda's Alliance Houston Office. Prior to moving to the United States, he gained significant experience advising oil companies and living in West Africa, including in Gabon and Cameroon, where he was based at Miranda's local offices.

Luís completed his law degree and LL.M. in International Comparative Law at the University of Toulouse (France). He also obtained an LL.M. in Energy, Environment, and Natural Resources Law at the University of Houston. Luís is fluent in Portuguese, French, and English and has a good knowledge of Spanish. He is currently serving on the Executive Committee of the Association of International Energy Negotiators as Vice President for Conferences. In addition, Luís is a member of the Institute for Energy Law (also currently serving the organization at the Executive Committee level) and of the American Bar Association (acting as Senior Advisor of both the International Anti-Corruption Committee and the International Energy & Environmental Law Committee).

BIOGRAPHIES



NORMAN NADORFF

Special Counsel, Mayer Brown, Houston/Rio de Janeiro - Adjunct Professor, University of Houston Law Center - Co-Chair, AIEN Model Host Government Agreement Drafting Committee

Norman Nadorff is Special Counsel to the Mayer Brown law firm in Houston and works extensively with the Rio de Janeiro office. His practice centers on energy law and transactions and ethics law compliance.

For 30 years, Nadorff served as in-house counsel for major oil companies with primary focus on Latin America, West Africa, and Indonesia. He was Senior Counsel for BP in Angola from 2006 to 2015 as well as Legal Manager for BP Brazil and ARCO Indonesia, where he held two expatriate assignments in the 1990s. Nadorff has dealt with a wide range of commercial contracts, including farmout, unitization, joint operating, study and bidding, EPC, drilling and wellsite services, gas sales, shareholder, joint venture, and project finance agreements, as well as a wide variety of host government granting instruments.

At ARCO, Nadorff wrote the Company's policies on Foreign Corrupt Practices Act, US Anti-Boycott laws and US Export Regulations. He has participated in foreign sited investigations of corruption, fraud, conflict of interest, and hostage-taking and helped resolve various commercial disputes.

Nadorff has taught International Energy Contracts at the University of Houston Law Center every year since 2012 and in numerous U.S. and foreign law schools. In 2006, he played key roles in the creation of a pioneering international oil and gas master's program at Angola's national law school, which is now in its 19th year. Most recently Nadorff taught at Brazil's FGV Law School as a Fulbright Specialist. He also lectures frequently in law schools and privately on petroleum law, anti-corruption laws, contract drafting and negotiations, and development of local talent. Nadorff is fluent in Portuguese and Spanish, proficient in French, and has experience negotiating in all three languages. He is currently a Director of the Brazil-Texas Chamber of Commerce and a former Director of the Association of International Energy Negotiators, in which he is active in several capacities, including Co-Chair of the 2022, 2023, and 2025 Model Contracts Workshops, Co-Chair of the newly created Host Government Agreement Drafting Committee, and member of the Education Advisory Board.



ALEXANDER K. OBRECHT

*Partner, BakerHostetler
Denver, CO*

Alexander Obrecht is a partner at BakerHostetler in Denver, Colorado. Obrecht co-leads the firm's national Energy Industry team and concentrates his practice on energy regulation and litigation, focusing on oil and gas development on federal lands, federal and private oil and gas royalties, midstream contracts and disputes, and hazardous materials transportation and compliance. Having grown up and attended law school in Wyoming, one of the leading energy-producing states in the country, Obrecht adds a practical understanding to the complex legal and political environment in which his clients operate.



ANN RYAN ROBERTSON

*Independent Arbitrator
Ann Ryan Robertson PLLC
Houston*

Ann Ryan Robertson, Chartered Arbitrator, FCI Arb, FColl Arb, was the 2021 global President of the Chartered Institute of Arbitrators and served as the Chair of the ICDR Rules Revision Committee responsible for the 2021 ICDR Mediation and Arbitration Rules. An independent arbitrator in Houston, Texas, Ann is an experienced chair, party appointed, sole and emergency arbitrator and is listed on the rosters of the major arbitral institutions. A recipient of many awards and honors, the United States Department of Trade selected Ann as one of ten arbitrators appointed by the United States to serve as a dispute settlement panelist pursuant to Chapter 31 of the United States-Mexico-Canada Agreement (USMCA). Named to Global Arbitration Review's "Who's Who Legal: Arbitration" since 2015, in 2024 and 2025 WWL has designated Ann as a "WWL Thought Leader: Arbitration," individuals "worthy of special mention owing not only to their vast expertise and experience . . . but also their ability to innovate and inspire." She has also been recognized by "The Best Lawyers in America, International Arbitration/Governmental" since 2014. Ann is a frequent author and speaker on arbitration issues, an adjunct professor at the University of Houston Law Center and for eighteen years coached the Law Center's Vis Moot team.

BIOGRAPHIES



JEFF ROMERO

*Partner, Tax
Skadden, Arps, Slate, Meagher & Flom LLP
Houston*

Jeff Romero advises public and private companies on a broad range of U.S. federal income tax matters, with a concentration on domestic and cross-border mergers and acquisitions, dispositions, spin-offs, joint ventures, and internal integration and restructuring transactions. He also represents clients with regard to the taxation of debt and equity financings, initial public offerings and renewable energy projects.

Romero has worked on notable matters for The AES Corporation; Altaba Inc.; Biogen Inc.; Citigroup Inc.; Computer Sciences Corporation; Duke Energy Corporation; DXC Technology; Ford Motor Company; GE Capital; Gilead Sciences, Inc.; Hasbro, Inc.; JLL Partners; Mars, Incorporated; Veritas Capital; and Yahoo! Inc.

In recognition of his work in tax law, he has been repeatedly named one of Best Lawyers' Ones To Watch in America. Romero frequently lectures on tax-related topics, including corporate taxation, M&A transaction structuring and renewable energy tax benefits.



AMIT M. SACHDEVA

*Partner, Transaction Tax Advisory
Ernst & Young
Houston*

Amit Sachdeva is a Houston-based Partner in the US National Transaction Tax practice focused on cross-border M&A transactions and capital markets transactions. Amit spent three years on the US Tax Desk in London in the UK focusing on UK, EMEIA and Asia clients. Prior to joining EY, Amit worked for a tax law firm, where he was recognized by Legal 500 as "an up-and-coming tax lawyer." Amit is a regular commentator to New York State Bar Association Tax Section reports and is a frequent speaker at American Bar Association conferences. Amit taught a Master Class on US M&A Tax at the LSE in 2022 and 2023.



BRYAN SCHILLINGER

*Managing Director, Global Trade
Ernst & Young
Houston*

Bryan Schillinger is a Managing Director with Ernst & Young's Global Trade practice. Bryan has over thirty years of experience with export controls, economic sanctions, antiboycott, and customs laws. His background includes prior legal practice and previous service as International Trade Counsel for a global Fortune 500 oilfield service company where he advised on trade matters regarding some of the most challenging countries in the world.

Bryan's background includes matters under the jurisdiction of the Office of Foreign Assets Control (embargoes and sanctions, specially designated nationals and blocked persons), Directorate of Defense Trade Controls (International Traffic in Arms Regulations), Bureau of Industry and Security (Export Administration Regulations, including dual use export controls, proliferation controls, denied persons and entities, antiboycott), and Customs and Border Protection (various import and export laws).

Bryan has extensive experience addressing customs, export control, and sanctions issues related to the energy sector. He provides advice on unique customs compliance topics impacting oilfield service/upstream operations, such as exoneration/production sharing arrangements, temporary imports under bond/lost-in-hole, and customs valuation of moved tools. Bryan has a deep understanding of goods, software and technology used in the energy, chemical and petrochemicals sectors (upstream, midstream, downstream, renewables) that are subject to strong export controls, as well as practical experience with addressing US economic sanctions in the energy sector.

BIOGRAPHIES



JENNY SPECK

*Partner, Tax
Vinson & Elkins LLP, Houston*

Jenny Speck advises clients on the qualification for and the monetization of energy transition tax incentives. She has worked on a range of energy transition projects, including onshore and offshore wind, solar, combined heat and power, biogas property, carbon capture, hydrogen and clean fuel credit projects.

She has firsthand knowledge of the carbon capture industry, having served as the senior manager of tax and regulatory compliance at Navigator CO2 Ventures LLC from April 2022 through October 2023. At Navigator, Jenny led all aspects of tax qualification, utilization and reporting compliance for federal income energy tax credits and served as Navigator's sole liaison with the U.S. Department of Energy. She was recruited and served as an independent Merit Reviewer of the Department of Energy loan program for carbon capture and storage demonstration projects. Jenny also provides tax advice on traditional purchase agreements, including the sale and purchase of tax credits, joint ventures, financings and other general transactional work.



BENJAMÍN TORRES-BARRÓN

*Partner, Baker & McKenzie Abogados, S.C.
Mexico City, Mexico*

Benjamín Torres is the leader for Baker McKenzie's Energy, Mining & Infrastructure (EMI) and Projects Practice Group in Latin America and Mexico. He handles all legal matters related to the financing, development and construction of real estate, mining, infrastructure, and energy projects. His career includes advising clients on the development, acquisition and/or sale of projects related to oil, natural gas, water, waste, railroad, ports, airports, highways, LPG, LNG, biofuels, energy efficiency, electricity, and public bids called by Pemex, CFE, and other Mexican governmental entities.

Benjamín has represented clients before the regulatory authorities and agencies in matters regarding energy projects; advised clients on maritime and navigation matters, due diligence, development, drafting and negotiation of contracts and financing. He also has advised clients regarding regulatory issues in connection with the sale, acquisition, leasing, subleasing, rights of way, construction, maritime transportation, trusts, insurance, utilities, environmental and ejido matters in connection with energy, hospitality (tourism), residential, mining, and industrial projects. His professional expertise also includes project financing, corporate law, joint ventures, mergers and acquisitions.

BIOGRAPHIES



BRET WELLS

*John Mixon Chair & Professor of Law
University of Houston Law Center*

Bret Wells teaches in the areas of federal income taxation, corporate taxation, and international taxation. He is a frequent speaker at conferences on tax matters.

Professor Wells is the lead author on a treatise on International Taxation entitled Joseph Isenberg & Bret Wells, *International Taxation: U.S. Taxation of Foreign Persons and Foreign Income* (Wolters Kluwer 6th ed. Updated 2024). He also is an author for the Insights & Concepts book on International Taxation entitled Bret Wells, *International Taxation* (Foundation Press 5th ed. 2022). Professor Wells is also a co-author on a leading casebook on International Taxation entitled Reuven S. Avi-Yonah, Diane M. Ring, Yariv Brauner, and Bret Wells, *U.S. International Taxation: Cases and Materials* (Foundation Press 5th ed. 2022). Professor Wells is also

a co-author on a leading casebook on Corporate Taxation entitled Martin J. McMahon, Daniel L. Simmons, Charlene D. Luke, and Bret Wells, *Federal Income Taxation of Corporations* (Foundation Press 5th ed. 2019). He is a co-author on a leading casebook on Partnership taxation with the same authors, entitled *Federal Taxation of Partnerships and S Corporations* (Foundation Press 5th ed. 2020). These co-authors also wrote a leading casebook on Business Taxation entitled *Federal Income Taxation of Business Organizations* (Foundation Press 5th ed. 2020). He is also a co-author on a leading casebook on Federal Income Taxation entitled Daniel L. Simmons, Martin J. McMahon, Bradley T. Borden, and Bret Wells, *Federal Income Taxation* (Foundation Press 8th ed. 2020). Professor Wells has also published numerous articles on federal taxation. Professor Wells joined two other prominent tax professors in an amicus brief with the U.S. Supreme Court in *Moore v. United States*, Docket No. 22-800, and Professor Wells was an active witness at hearings that led up to the recent tax reform in 2017. He has testified (by invitation) before the Senate Finance Committee, the Senate Permanent Subcommittee on Investigations, and the U.S. House Committee on Ways and Means Subcommittee.

Professor Wells holds a Juris Doctorate from the University of Texas School of Law (cum laude, 1989). He also holds a B.B.A. in Accounting from Southwestern University (summa cum laude, 1987). He is licensed to practice law and is a Certified Public Accountant in the state of Texas.



ANDREW WRIGHT

*Partner, Buck Keenan LLP
Houston*

Andrew Wright is a Partner at Buck Keenan LLP, where he represents both plaintiffs and defendants in all types of commercial litigation in federal courts, state courts, and domestic and international arbitrations. He is a skilled advocate and has tried and won jury trials, bench trials, injunctions, and arbitrations across the country for his clients involving breach of contract, oil and gas, tort, construction, real estate, consumer, and trade secrets issues. Wright has significant experience representing clients in disputes before the AAA, ICC, and UNCITRAL. Wright also advises clients on intellectual property matters and has an active trademark docket helping clients register, maintain, and protect their trademarks in the United States and internationally.

Wright received a Bachelor of Arts in Philosophy from Colgate University in 2004, his law degree from South Texas College of Law in 2007, and a Master of International Law and Business from Bucerius Law School/WHU School of Management (Germany) in 2008.

BIOGRAPHIES



DENNEY WRIGHT

*Professor of Practice
University of Houston Law Center
Lecturer, Bauer College of Business, University of Houston*

Denney Wright retired from Exxon Mobil Corporation in November 2016 after over forty-two years of service and was appointed a Professor of Practice at the University of Houston Law Center in 2017. In his role as a Professor of Practice, Professor Wright has been teaching Oil and Gas Tax and International Petroleum Transactions. He also teaches Oil and Gas Tax at the Bauer College of Business at the University of Houston. He has organized and implemented continuing education programs, including this Annual University of Houston Law Center Denney L. Wright International Energy Tax Conference. Professor Wright is serving as advisor to the *Houston Business and Tax Law Journal* and the Association of International Energy Negotiators

UHLC Chapter. He is a member of the Texas Bar, a member of the American Bar Association, and has been a participant in many oil and gas industry groups during his long career with ExxonMobil. He is on the Advisory Board of the Texas Federal Tax Institute and has been a member of the planning committee and a speaker at the Parker Fielder Oil and Gas Tax Conference, American Petroleum Institute Federal Tax Forum, and many other conferences over the years.

Professor Wright has taught Oil and Gas Tax at UHLC for over twenty-five years, and he has taught the class at New York University Law School, Dedman School of Law at Southern Methodist University as well as University of Texas Law School. He published “Understanding the Windfall Profits Tax Act” in the *Petroleum Landman* in 1980 and co-chaired with the Chinese Director of Taxation the United States/China Oil and Gas Tax Joint Government/Industry Biennial Conference in Beijing, China, in 1998. Professor Wright published revisions to Bloomberg Bureau of National Affairs Tax Portfolio Series Tax Incentives for Production and Conservation of Energy and Natural Resources (Portfolio 512-2d) in 2019 and 2020 as well as in 2023, in co-authorship with Julie Chapel of KPMG. Professor Wright’s oil and gas tax casebook, *Oil and Gas Tax: A Comprehensive Study*, was published by Wolters Kluwer/CCH in 2019. The casebook has received extremely positive reviews (5.0 out of 5.0) and has been adopted as the required casebook for the subject in both business and law schools. In addition to its use in oil and gas tax classes, the book serves as an invaluable resource to the oil and gas tax practitioner. In 2023 and 2024 Professor Wright presented a summary update on oil and gas taxation to various chapters of the Texas Society of Certified Public Accountants. These day-long workshop presentations were presented in San Angelo, Victoria, Midland/Odessa, and Tyler and it is anticipated other chapters will request similar workshops in the coming year(s).



ANDREW ZEVE

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Andrew Zeve, a nationally recognized trial lawyer, represents clients in complex commercial disputes and in intellectual property litigation, with an emphasis on trade secrets. He is a Partner at White & Case LLP in the Houston office. Zeve’s experience as a litigator includes first-chair jury trials, bench trials, and arbitrations in state and federal courts across the United States.

Zeve has an esteemed track-record representing clients in the energy industry, with The Legal 500 US remarking, “Zeve is noted for his expertise in oil & gas disputes,” as well as in real estate, finance, and construction. Zeve has been named as a Next Generation Partner for Energy Litigation by The Legal 500 US and has been cited multiple times as a Texas Rising Star and a Texas Super Lawyer by Thompson Reuters Texas Super Lawyers. Zeve served as an intern to the Honorable David Hittner in the U.S. District Court, Southern District of Texas.



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