

**AMENDMENT TO RULES COMMITTEE PRINT 114-5
OFFERED BY MS. KUSTER OF NEW HAMPSHIRE**

Page 9, strike lines 6 through 9 and insert the following:

1 **SEC. 6. FISCAL RESPONSIBILITY THROUGH REPEALING BIG**
2 **OIL TAX SUBSIDIES.**

3 (a) DENIAL OF DEDUCTION ATTRIBUTABLE TO OIL,
4 NATURAL GAS, OR PRIMARY PRODUCTS THEREOF.—
5 Paragraph (4) of section 199(c) of the Internal Revenue
6 Code of 1986 is amended by adding at the end the following new subparagraph:

8 “(E) SPECIAL RULE FOR CERTAIN OIL
9 AND GAS INCOME.—In the case of any taxpayer
10 who is a major integrated oil company (as defined in section 167(h)(5)(B)) for the taxable
11 year, the term ‘domestic production gross receipts’ shall not include gross receipts from the
12 production, transportation, or distribution of
13 oil, natural gas, or any primary product (within
14 the meaning of subsection (d)(9)) thereof.”.

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17 (b) LIMITATION ON DEDUCTION FOR INTANGIBLE
18 DRILLING AND DEVELOPMENT COSTS.—Section 263(c) of
19 the Internal Revenue Code of 1986 is amended by adding

1 at the end the following new sentence: “This subsection
2 shall not apply to amounts paid or incurred by a taxpayer
3 in any taxable year in which such taxpayer is a major inte-
4 grated oil company (as defined in section 167(h)(5)(B)).”.

5 (c) EFFECTIVE DATES.—

6 (1) The amendment made by subsection (a)
7 shall apply to taxable years beginning after Decem-
8 ber 31, 2015.

9 (2) The amendment made by subsection (b)
10 shall apply to amounts paid or incurred in taxable
11 years beginning after December 31, 2015.

