



Doing Business in Nigeria: Navigating the Nigerian Oil & Gas Industry

www.strenandblan.com
contact@strenandblan.com
cdq@strenandblan

+234 (0)702 558 0053
3 Theophilus Orji Street, Off Fola Osibo
Road, Lekki Phase 1, Lagos, Nigeria

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Regulators

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Who Regulates the Oil and Gas Industry in Nigeria?

A. The Nigerian oil and gas industry is regulated across three key segments, each with designated regulatory bodies:

i. Upstream Sector

Nigerian Upstream Petroleum Regulatory Commission (NUPRC)

The NUPRC is responsible for overseeing oil and gas exploration, production, and licensing activities. It regulates upstream operations, ensuring compliance with technical, safety, and environmental standards. The NUPRC also regulates upstream oil servicing companies, including those offering drilling, seismic, and engineering services to exploration and production companies.

ii. Midstream & Downstream Sector

Nigerian Midstream and Downstream Petroleum Regulatory Authority (NMDPRA)

The NMDPRA regulates midstream and downstream activities, including crude oil refining, natural gas processing, transportation, storage, distribution, and marketing of petroleum products. It also oversees oil servicing companies operating in the midstream and downstream sectors, such as pipeline contractors, refinery maintenance firms, and logistics companies involved in the movement of petroleum products.

iii. Policy & Oversight

Federal Ministry of Petroleum Resources

The Ministry of Petroleum Resources provides overall policy direction and oversight for the oil and gas sector. It formulates regulations, facilitates investment, and ensures alignment with national energy policies. The Ministry also plays a role in policy formulation and strategic guidance affecting oil servicing companies, promoting local content participation and investment across all segments of the industry.

B. There is also the Nigerian Content Development and Monitoring Board that regulates the local content in Nigeria, promoting indigenous participation and technology transfer in the oil & gas sector.

Are There Non-Sector-Specific Regulators?

There are other non-sector-specific regulators. These regulators govern doing business in Nigeria across all sectors and industries. They include:

a. Corporate Affairs Commission (CAC)

All businesses operating in Nigeria must be registered with the CAC. The incorporation grants the company a legal identity, enabling it to operate lawfully and secure permits.

b. National Investment Promotion Commission (NIPC)

Companies with foreign participation are required to register with the NIPC prior to commencing operations in Nigeria, as required by the National Investment Promotion Commission Act.

c. Federal Inland Revenue Service (FIRS)

Companies in Nigeria are required to register with the FIRS in compliance with tax laws. Under the New Tax Act, the Federal Inland Revenue Service (FIRS) has been restructured and renamed the Nigeria Revenue Service (NRS), effective 1 January 2026. Companies are required to align with the consolidated Nigeria Tax Act and its compliance framework.

What Business Models are Most Suitable Within the Oil and Gas Sector in Nigeria?

Taking the complexities of the oil and gas business in Nigeria, the capital requirement and associated risk, different business models are adopted by industry players. Each business model has its strengths, and the choice for adoption of a model is dependent on the size of the company, risk appetite, and available capital of the prospective operator. The following are the prominent models:

a. Joint Venture (JV) Arrangement

This is presented as a partnership between the Nigerian National Petroleum Corporation Limited (NNPCL) and international or local oil companies. Under this arrangement, parties contribute funding and receive crude oil produced in proportion to their participating interest in the Joint Venture Agreement (JVA). An example of a JV in Nigeria is the Shell Petroleum Development Company JV made up of Renaissance consortium, NNPCL, Total Exploration and Production Nigeria Ltd and Agip Energy and Natural Resources (Nigeria) Limited.

A JV may be an Incorporated JV or an Unincorporated JV.

- i. An Incorporated JV is a JV where a separate entity is created by the Parties, with the Parties as shareholders. The separate entity has a legal identity separate from the parties but is owned and operated by the parties according to their participating interest in the JVA. Assets contributed to the JV are owned by the company.
- ii. An Unincorporated JV (UJV) is a JV that does not require a separate legal entity to operate and carry on business. A UJV is created and governed by contract – the JVA. Profit distribution, asset management and ownership are all determined by the parties under the JVA.

In addition to exploration and production companies, oil servicing companies can also enter into such joint venture arrangements. These partnerships allow service companies to collaborate with operators or investors, contributing technical expertise, equipment, or funding in exchange for a share in project revenues or other negotiated benefits.

What Business Models are Most Suitable Within the Oil and Gas Sector in Nigeria?

b. Profit Sharing Contract (PSC)

This is presented as an arrangement in which the operator funds the exploration and production and recovers costs through oil produced, and profit is shared based on agreed terms by the parties. Under this arrangement, the Nigerian government retains ownership of the resources but contracts with companies to manage and develop them. An example of an existing PSC in Nigeria is the renewed PSCs by NNPC over OML128, 130, 132, 133 and 138.

c. Service Contract/ Technical Service Agreement

This arrangement is applicable to servicing companies within the sector. Under this arrangement, the contractor performs operations on behalf of NNPC and or a license holder/ international oil company (IOC) and is paid a fee as agreed by the parties.

d. Midstream Models

Under the midstream sector, the prevalent models are either a Public-Private Partnership (PPP) or a private infrastructure model. Under the PPP, private investors partner with the government for the development of midstream projects, including pipeline, storage and transport infrastructure. However, under the private infrastructure model, private investors develop and operate midstream projects. A typical example is the existing Dangote Refinery.

e. Downstream Models

Available models under the downstream sector include retail franchising – setting up of filling stations under a major brand and bulk trading of oil and gas.



Upstream Operations

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What Licenses are Required for Upstream Operations?

Licensing in the upstream sector of oil and gas is dependent on the activities to be carried out by the applicant. These are the three major licenses within the upstream sector and their application:

a. Petroleum Exploration License (PEL) – This license grants the holder a non-exclusive right to carry out petroleum exploration operations within the area which the license covers. The activities to be carried out by a holder include geological, geophysical and geochemical surveys. This license does not permit drilling or commercial exploitation and is granted for a period of three (3) years, with the possibility of renewal for an additional three (3) years.

b. Petroleum Prospecting License (PPL) – This license grants the holder an exclusive right to drill exploration and appraisal wells, with a non-exclusive right to carry out petroleum exploration operations within the area covered by the license. It also grants the holder the right to carry and dispose of crude oil or natural gas won or extracted during the drilling of exploration and appraisal wells. In accordance with the Petroleum Industry Act, the initial term of a PPL granted in respect of onshore and shallow water acreages is three (3) years, renewable for an additional term of three (3) years, resulting in a maximum duration of six (6) years. For deep offshore and frontier acreages, the initial term is five (5) years, with a renewable term of five (5) years, allowing for a total duration of up to ten (10) years.

c. Petroleum Mining Lease (PML) – Under the Petroleum Industry Act (PIA), a Petroleum Mining Lease (PML) grants the holder the exclusive right to develop and produce petroleum from a proven, commercially viable reservoir within the lease area. It also confers non-exclusive rights to continue exploration within the same area. This distinguishes the PML from other licences such as the PEL and PPL, which are primarily intended for the search and delineation of petroleum resources. A PML is granted for a period of up to twenty (20) years, and a renewal of the lease is permitted; however, applications for renewal must be submitted to the NUPRC no later than twelve (12) months prior to the expiration of the current lease term.



Are there Applicable Licenses for Service Providers in the Upstream Sector?

Yes. There is the Oil and Gas Industry Service Permit (OGISP). This is a mandatory authorization issued by the NUPRC for oil servicing companies in Nigeria's upstream oil & gas industry. It ensures regulatory compliance, promotes local content participation, and categorizes service providers based on their technical expertise. The permit is classified into General, Major, and Specialized categories, covering a wide range of services from logistics and engineering to drilling and well intervention. Applicants must meet specific requirements, including CAC registration, tax compliance, Nigerian Content commitments, and HSE standards. Without this permit, companies cannot legally operate in Nigeria's upstream industry.

What Environmental Approvals are Required to Operate in the Upstream sector?

a. Environmental Impact Assessment (EIA)

An operator within the upstream sector is required to get an EIA approval from the Ministry of Environment before commencing drilling and exploration activities.

b. Gas Flaring Permit

Under specific circumstances, where gas flaring is required for facility start-up or for strategic operational reasons, license holders are required to apply to the NUPRC for approval to flare gas.

What Tax Obligations Exist for Upstream Operators?

The following are tax obligations applicable to upstream operators, under the Companies and Allied Matters Act (2020) and the PIA:

a. Hydrocarbon Tax (HT)

This tax specifically applies to crude oil, field condensates, liquid, and natural gas liquids derived from associated gas. Its rates are: **15% for onshore and shallow onshore PPL and marginal fields**, and **30% converted/renewed onshore and shallow offshore PML**.

Note: The Hydrocarbon Tax (HT), which specifically applies to crude oil, field condensates, liquid, and natural gas liquids derived from associated gas, does not apply to oil servicing companies. Under the new Tax Act (effective from 1 January 2026), upstream operators will also be subject to the consolidated tax framework, which harmonises petroleum taxation on HT, royalties, and decommissioning costs.¹

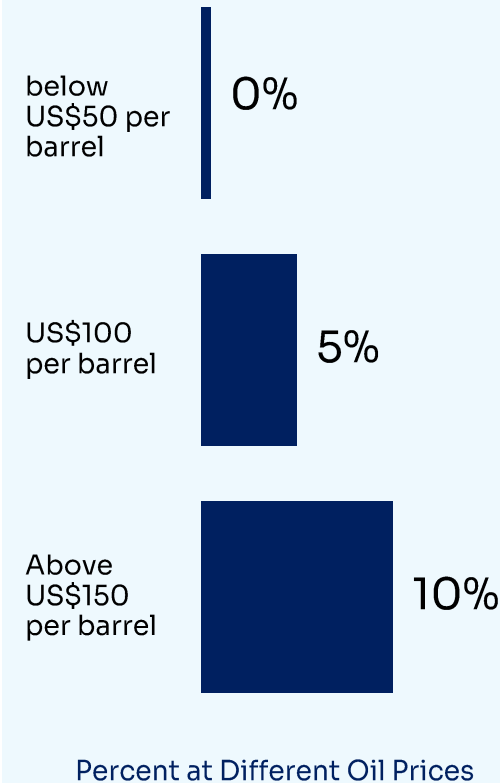
b. Company Income Tax (CIT)

This tax is levied at a rate of 30% on the taxable profits of the license holder, applying to both exploration companies and oil servicing companies, and this rate has been retained under the New Tax Act.

c. Royalty Payments

Royalties are calculated based on the production levels and location of the license holder. For onshore and shallow water, the rates are set between 5%–15%; for deep offshore, the rates are set at 5%–7%; while the frontier basin is set at 7.5%.

Upstream petroleum operators, in addition to the royalties applicable to onshore, shallow water and deep offshore production, are required to pay a royalty by price on crude oil and condensates at the following rates:



The price levels stated above applied in 2020 and, **beginning from 2021** and for each succeeding year, **have been increased by 2% relative to the values of the previous year**. There is no royalty by price for frontier acreages. All revenues from the royalty by price are for the credit of the Nigerian Sovereign Investment Authority.

These rates do not apply to oil servicing companies.

Under the New Tax Act, the royalty-by-price and production mechanism under the Petroleum Industry Act (PIA), 2021, has been preserved in the new tax regime.

¹ Under the new Tax Act incorporates the provisions of the PIA that the hydrocarbon tax shall be calculated as a percentage of the aggregated chargeable profit: 30% for crude oil from Petroleum Mining Leases in onshore and shallow water areas, and 15% for crude oil under Petroleum Prospecting Licences in similar terrains.

What Tax Obligations Exist for Upstream Operators?

d. Value Added Tax:

This is charged at 7.5% on goods and services purchased within Nigeria, applicable to both oil servicing and exploration companies and has been retained under the new Tax Act. Under the new Tax Act, the following supplies are exempt from VAT, (a) oil and gas exports; (b) crude petroleum oil and feed gas for all processed gas..

e. Withholding Tax:

This is charged at 5%-10% on payments for contracts, dividends, interest, etc, depending on the transaction type, and applies to both oil servicing and exploration companies.



Are There Any Tax Incentives for Upstream Operators?

While a plethora of tax obligations seemingly apply in the upstream sector, it is important to note that the government has introduced various incentives within the sector to encourage investments and participation. Well-positioned companies in the upstream sector can take advantage of these incentives. These tax incentives and tax allowances include:

a. Gas Tax Credit (GTC)

This is applicable to non-associated gas greenfield developments in onshore and shallow water locations, with first gas production required on or before January 1, 2029. The tax credit amount depends on the Hydrocarbon Liquids (HCL) content in the gas field: where the HCL content is 30 barrels per million standard cubic feet (MMSCF) or lower, the tax credit will be \$1/MMSCF (thousand SCF) or 30 percent of the fiscal gas price, whichever is lower. Where the HCL content is between 30 -100 barrels/MMSCF, the tax credit will be \$0.50/MMSCF or 30 percent of the fiscal gas price, whichever is lower.

If the GTC granted to an eligible company exceeds the amount of the

Companies Income Tax due from that company in an accounting period, the excess (GTC Surplus) can be rolled forward for up to three (3) accounting years. However, this incentive does not apply to oil servicing companies.

b. Gas Tax Allowance

This is applicable to gas projects that begin production after 1st January 2029. They will be eligible for a Gas Tax Allowance (GTA) of \$0.50/MMSCF or 30 percent of the fiscal gas price, whichever is lower, provided the HCL content does not exceed 100 barrels per million SCF. However, this incentive does not apply to oil servicing companies.

Restrictions



The tax credit cannot exceed the CIT payable for that year.



Additionally, the gas tax credit cannot be combined with Associated Gas Framework Agreement (AGFA) incentives for the same greenfield non-associated gas project.

Are There Any Tax Incentives for Upstream Operators?

c. Deep Offshore Oil and Gas Production Tax Incentive

Deep offshore developments within Oil Mining Leases (OMLs) and Petroleum Mining Leases (PMLs) that operate under production sharing contracts (PSC) or profit-sharing contracts are eligible for production tax credit incentives. This incentive is tied to crude oil and non-associated gas production. However, this incentive does not apply to oil servicing companies.

d. Hydrocarbon Tax Exemption

Deep offshore operations are exempted from the hydrocarbon tax. Also, natural gas income is exempt from the hydrocarbon tax. However, this incentive does not apply to Oil servicing companies.

e. Export VAT Exemption

No VAT is charged on exports of crude oil and gas from Nigeria.

f. Royalty on Gas Production

Royalty rates on gas production are at a reduced rate of 2%–7%. However, this incentive does not apply to Oil servicing companies.

g. Tax Holiday

Up to 5 years of pioneer status for gas utilization projects.

2%–7%.

Reduced
Royalty rates

What Other Financial Obligations Must Upstream Operators Comply With?

Aside from tax obligations, upstream operators are also required to meet various other statutory financial obligations, which include:

a. Nigerian Content Development Fund (NCDF) Contribution

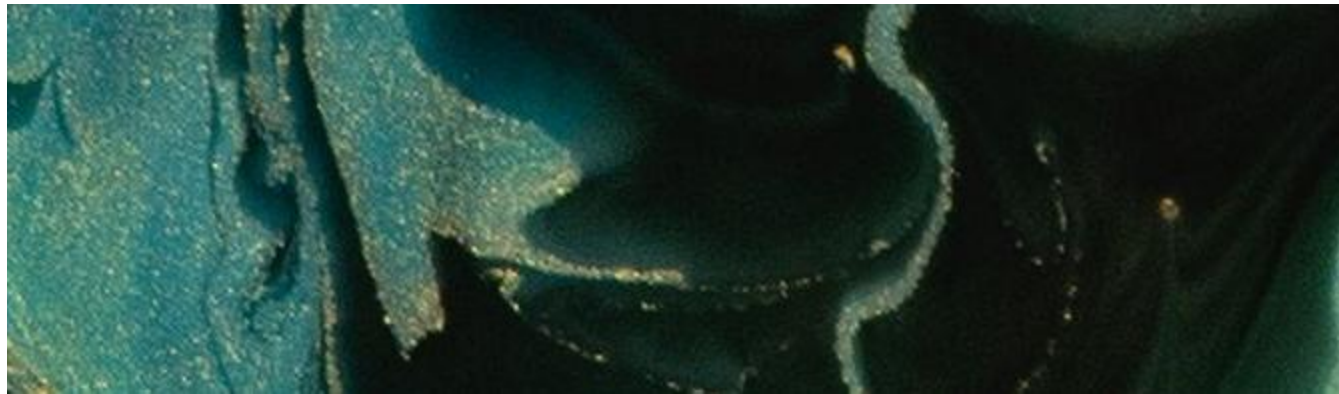
A sum of one percent (1%) of every contract awarded to any operator, contractor, subcontractor, alliance partner, or any other entity involved in any project, operation, activity, or transaction in the upstream sector of the Nigerian oil and gas industry is to be deducted at source and paid into the Nigerian Content Development Fund (NCDF).

b. Host Community Development Obligation

Upstream operators engaged in exploration and production (E&P) are required to contribute 3% of their actual annual operating expenditure (OPEX) from the preceding financial year to the Host Community Development Trust (HCDDT). This financial obligation does not apply to oil servicing companies.

c. Decommissioning and Abandonment Obligation

Under the Petroleum Industry Act, upstream operators are required to make annual contributions to a Decommissioning and Abandonment Fund. As provided under the PIA, the amount is determined based on a decommissioning and abandonment plan approved by the NUPRC. This financial obligation does not apply to oil servicing companies.



Midstream & Downstream Operations

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What Licenses are Required for Midstream and Downstream Activities?

The NMDPRA has the authority to grant licenses to operators in the midstream and downstream sectors. These licenses are categorized generally into Midstream and Downstream Gas Operations and Midstream and Downstream Petroleum Liquids Operations.

Some of the licenses in Nigerian Midstream and downstream operations include:

a. Licenses for Petroleum Liquids Operations in Nigeria

i. Petroleum Liquids Transportation Pipeline License:

This grants exclusive rights for owning, constructing, operating, and maintaining a transportation pipeline for petroleum liquids within a defined route.

ii. Crude Oil Refining License: This license permits the licensee to procure, construct, install and operate facilities to process crude oil on its account into derivative chemicals and petroleum products. The holder of this licence also has access to harbours, jetties, petroleum bulk storage, transportation facilities and pumping installations.

iii. Bulk Petroleum Liquids Storage License:

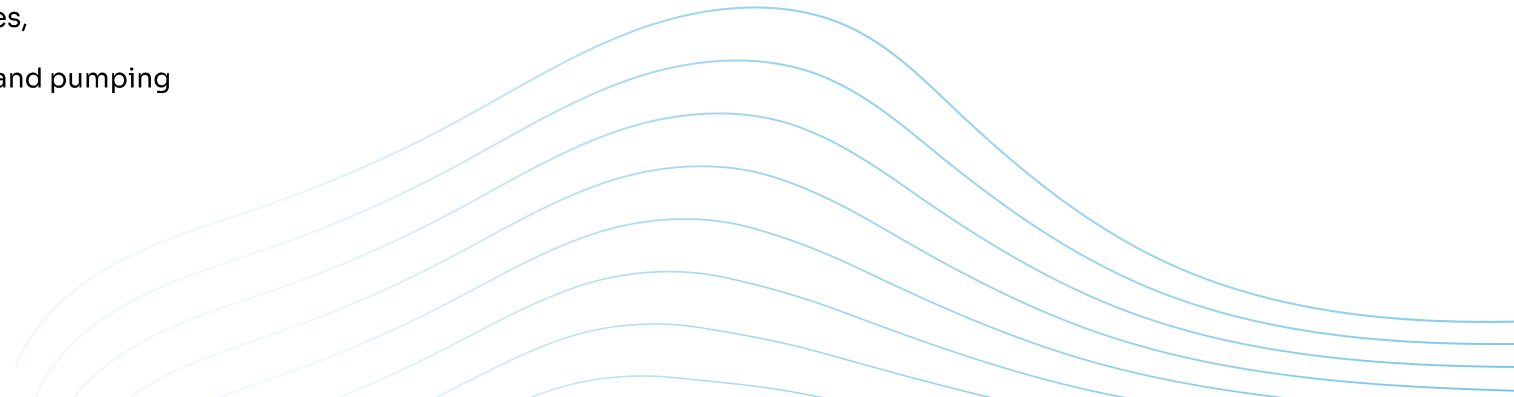
This license gives the holder the right to load and unload petroleum products in a licensed bulk storage facility and to undertake the bulk storage of petroleum liquids, whether on its account or on behalf of customers.

iv. Petroleum Products Distribution License:

This license authorizes the holder to develop and maintain a safe, efficient, reliable, and economical service for the distribution of petroleum products to individual customers and petroleum product retailers.

v. Wholesale Petroleum Liquids Supply License:

This license authorises the supplier to sell and deliver petroleum liquids to bulk customers in Nigeria or for export.



b. Licenses for Gas Operations in Nigeria

i. Gas Processing License:

This license grants the licensee the right to install and operate gas conditioning, processing, gas-to-liquid, liquefied natural gas, and ethane extraction plants.

ii. Bulk Gas Storage License:

This license authorizes the holder to undertake the bulk storage of natural gas either on its account or on behalf of customers.

iii. Wholesale Gas Supply License:

This license grants the holder the right to purchase natural gas directly from a lessee or third party and sell and deliver wholesale gas to wholesale customers and gas distributors at any location in Nigeria.

iv. Retail Gas Supply License:

This license authorizes the holder to sell or retail compressed or liquefied marketable natural gas to customers and establish, construct, and operate facilities to deliver compressed natural gas and small-scale facilities for liquefied natural gas.

v. Gas Distribution License:

This license grants the licensee the right to establish, construct, and operate a gas distribution system and to distribute and sell its natural gas to consumers.

vi. Gas Transportation Pipeline License:

This license grants the licensee the exclusive right to own, construct, operate, and maintain a gas transportation pipeline within a route defined in the license on its account or as a common carrier. Where the license is granted on a common carrier basis, the holder cannot supply gas to customers on its own account.

What Environmental Approvals are Required for Midstream & Downstream Activities?

The following licenses are required for exploration and oil servicing companies carrying out midstream and downstream activities:

a. Environmental Impact Assessment (EIA)

An operator within the midstream and downstream sector is required to get an EIA approval from the Ministry of Environment before commencing drilling and exploration activities.

b. Environmental Permit

An operator is required to obtain an environmental permit from the NMDPRA for operations involving petroleum refining, gas processing, product storage, and distribution.

c. Environmental Compliance Certificate

This certificate is issued by the National Environmental Standards (NESREA), indicating that the company has met its environmental regulatory standards.

d. Waste Management and Air & Water Discharge Permits

These licenses are required by companies handling petroleum waste and hazardous materials or releasing emissions or wastewater from refineries, gas plants, and storage facilities. It is issued by the Federal Ministry of Environment, State Environmental Protection Agencies and NESREA



What Tax Obligations Exist for Midstream & Downstream Operators

a. Company Income Tax (CIT):

This tax is charged at a rate of 30% of the taxable profits. Like every other company, oil servicing companies are also subject to CIT.

b. Royalty Payments:

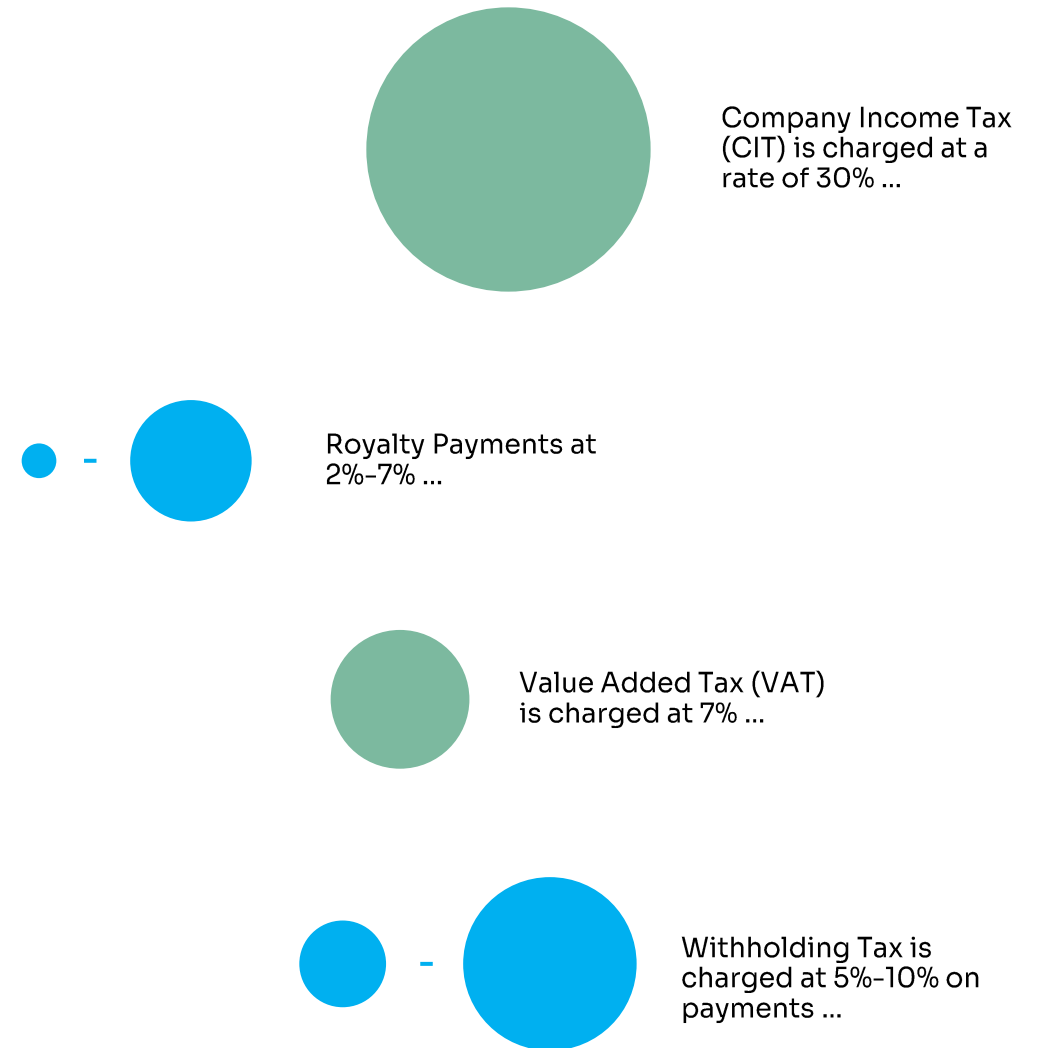
Midstream companies (except oil servicing companies) engaged in gas processing and LNG production pay royalties at 2%-7% based on production and location.

c. Value Added Tax:

This is charged at 7.5% on goods and services purchased within Nigeria and applies to oil servicing companies.

d. Withholding Tax:

This is charged at 5%-10% on payments for contracts, dividends, interest, etc, depending on the transaction type for all companies, including oil servicing companies.



What Tax Incentives Apply to Midstream and Downstream Businesses?

a. Pioneer Status Incentives

Pioneer tax holiday of up to 5 years for gas utilization.

b. Gas Utilization Investment Allowance (GUIA)

The Gas Utilisation Incentive Allowance (GUIA) permits a deduction of 25% of actual qualifying expenditure from assessable profits in the year the expense is incurred.

Restrictions



Operators currently benefiting from the tax-free period under Section 39(1)(a) of the Companies Income Tax Act (CITA) may only access the GUIA after the expiration of the tax holiday.



In addition, operators that have benefited from the GUIA will not be eligible for any further investment allowance under Section 39 of the CITA.

c. Investment Tax Allowances

Companies investing in gas pipelines, storage facilities, etc, can claim up to 35% tax deduction on qualifying capital expenditures.

d. Hydrocarbon Tax Exemption

Zero hydrocarbon tax on gas operations.

e. VAT Exemption:

Under the VAT Modification Order 2024, the following items are now exempt from VAT:

Items: equipment and infrastructure for CNG and LPG expansion, including conversion kits; domestic LNG processing facilities and equipment; electric vehicles and parts for their assembly; and Biogas and biofuel equipment for clean cooking and transportation.

Services: CNG conversion and installation services; LPG conversion and installation services; and manufacturing, assembly, and sale of electric vehicles

The Order also provides a new definition of “petroleum products”, which expands the previously exempt items to now include feed gas for all processed gas, Automotive Gas Oil (AGO), CNG, and Imported LPG.

The VAT Modification Order 2024 is applicable to oil companies and oil servicing companies engaged in the specified activities.

What Tax Incentives Apply to Midstream and Downstream Businesses?

f. Withholding Tax (WHT) Exemption

The following products are exempted from WHT:



Liquefied Petroleum Gas (LPG)



Compressed Natural Gas (CNG)



Low Pour Fuel Oil (LPFO)



JET-A1



Premium Motor Spirit (PMS)



Automotive Gas Oil (AGO)



Dual Purpose Kerosene (DPK)

g. Free Trade Zone (FTZ) Incentives

Oil servicing and exploration companies operating in designated oil and gas FTZs in Nigeria can benefit from 100% tax exemption on CIT, VAT, and WHT. They also enjoy duty-free imports for midstream infrastructure development.

h. Import Duty Exemptions

This is available for specific equipment used in refining, and it's applicable to all companies.

What Other Financial Obligations Must Midstream and Downstream Operators Comply with?

a. Host Community Development Obligation

Midstream and downstream operators are required to contribute 3% of their actual annual operating expenditure (OPEX) from the preceding financial year to the Host Community Development Trust (HCDT), in accordance with the provisions of the PIA. However, this obligation does not apply to oil servicing companies.

b. Decommissioning and Abandonment Obligation

Under the PIA, midstream and downstream operators are required to make annual contributions to a Decommissioning and Abandonment Fund. The percentage of the contribution to be made is based on a decommissioning and abandonment plan approved by the NMDPRA. Where no such plan exists, the licensee must submit one within one year of the effective date, following the criteria set out in the Act. However, this obligation does not apply to oil servicing companies.

Local Content

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What Are the Local Content Requirements in the Oil & Gas Industry?

Under the Nigerian Oil and Gas Industry Content Development Act, which is implemented by the Nigerian Content Development and Monitoring Board (NCDMB), oil & gas companies must meet the following requirements:

a. Equity Ownership

Nigerian companies must own at least 51% equity in service contracts. Also, indigenous oil and gas companies must be given reference in licensing rounds. This applies to oilfield services and Engineering, Procurement and Construction (EPC) contracts.

b. Employment

Employ at least 60% of Nigerians in top management positions and 100% of Nigerians in intermediate and junior-level positions.

c. Goods and Services

Must source materials and services from local suppliers. This is inclusive of legal and financial services.

d. Nigerian Content Plan

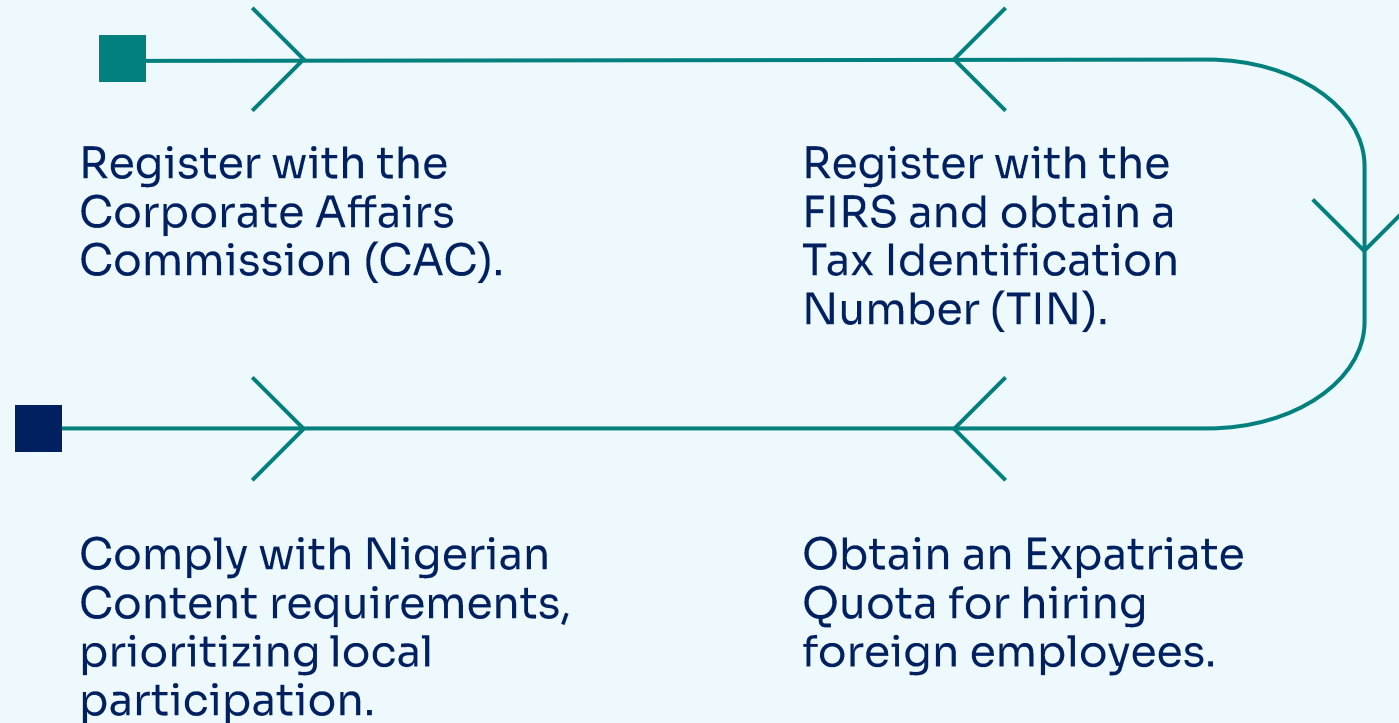
Must submit a Nigerian Content Plan to NCDMB before undertaking any project

Foreign Participation in the Nigerian Oil & Gas Market

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Can Foreign Companies Operate in Nigeria's Oil & Gas Sector?

Yes. Fully owned foreign companies or companies with foreign participation may operate in the Nigerian oil & gas sector, provided that these companies must:



How Stren & Blan Partners Can Assist?

At Stren & Blan Partners, we provide tailored legal and compliance advisory services for oil and gas contractors, including:

Regulatory compliance guidance for upstream, midstream, and downstream activities.

Contract structuring and risk assessment to mitigate legal exposure.

Tax advisory services for efficient fiscal planning in optimizing fiscal obligations while ensuring full compliance with the existing legal and regulatory framework.

Environmental compliance support to meet government standards.

For expert assistance, contact our team at transactions@strenandblan.com or visit our website at www.strenandblan.com



Obligations

Tax Obligations/Incentives	Oil Companies	Servicing Companies
Company Income Tax (CIT)		
Investment Tax Allowances		
Withholding Tax (WHT)		
Value Added Tax (VAT)		
Free Trade Zone (FTZ) Incentives		
Hydrocarbon Tax		

Tax Obligations/Incentives	Oil Companies	Servicing Companies
Gas Utilization Investment Allowance (GUIA):		
Gas Tax Credit (GTC):		
Pioneer Status Incentives		
Deep Offshore Oil and Gas Production Tax Incentive		
Gas Tax Allowance		
Export VAT Exemption		

Applicable

Not applicable

Tax Obligations/Incentives	Oil Companies	Servicing Companies
Royalty on Gas Production		
Hydrocarbon Tax (HT):		
Import Duty Exemption		
VAT Exemption		
Withholding Tax (WHT) Exemption		

Other Obligations

Tax Obligations/Incentives	Oil Companies	Servicing Companies
Host Community Development Obligation		
Decommissioning and Abandonment Obligation		
Nigerian Content Development Fund (NCDF) Contribution		

Applicable

Not applicable

About SBP

Stren and Blan Partners is a world-class ingenious law firm with a beautiful blend of the brightest minds and well-rounded individuals championed with sole responsibilities of providing solutions to business problems and equally finding answers to the questions of our clients. We are a team always guided by our professional ethics. Also, honesty and transparency have been our watchwords in practice.

Stren & Blan Partners is a full-service commercial Law Firm that provides legal services to diverse local and multinational corporations. We have developed a clear vision for anticipating our clients' business needs and surpassing their expectations, and we do this with an uncompromising commitment to Client service and legal excellence.

About SBP



**Ozioma
Agu**

Partner

OziomaAgu
@strenandblan.com



**David
Olajide**

Associate

DavidOlajide
@strenandblan.com



+234 (0)702 558 0053
3 Theophilus Orji Street, Off Fola Osibo
Road, Lekki Phase 1, Lagos, Nigeria

www.strenandblan.com
contact@strenandblan.com
CDQ@strenandblan