

VOC Energy Trust

2022

**Federal Income
Tax Information**

VOC Energy Trust
C/O The Bank of New York Mellon Trust Company, N. A.
601 Travis - 16th Floor
Houston, TX 77002

January 2, 2023

Important 2022 Income Tax Information

To Present and Former Unitholders:

This income tax information reporting booklet is intended to provide information required for your 2022 federal and state income tax returns relating to your ownership of units in the VOC Energy Trust (the "Trust") during 2022. The reporting booklet is available to be mailed to Unitholders of record on any of the appropriate record dates during 2022.

Please see Exhibit I for the payment schedule as determined per Treasury Regulation Section 1.1275-4.

To all middleman, brokers, representatives or agents of Unitholders: it is recommended that this income tax information reporting booklet be distributed to all Unitholders on whose behalf or account you hold Trust units or act as an intermediary.

This booklet will also be posted on the Internet website:
<https://voc.q4web.com>

The Trustee assumes that some Trust units are held by middlemen, as such term is broadly defined in U.S. Treasury Regulations (and includes custodians, nominees, certain joint owners, and brokers holding an interest for a customer in street name). Therefore, the Trustee considers the Trust to be a non-mortgage widely held fixed investment trust ("WHFIT") for U.S. federal income tax purposes. Accordingly, the Trust will provide tax information in accordance with applicable U.S. Treasury Regulations governing the information reporting requirements of the Trust as a WHFIT. The representative of the Trust that will provide the required information is The Bank of New York Mellon Trust Company, N.A., and the contact information for the representative is as follows:

The Bank of New York Mellon Trust Company, N.A., Trustee
Global Corporate Trust
601 Travis – 16th Floor
Houston, Texas 77002

Each unitholder should consult his or her own tax advisor for compliance matters.

VOC Energy Trust
EIN: 80-6183103

CUSIP Number: 91829B103

Classification: Non-Mortgage Widely Held Fixed Investment Trust

Calculation Period: Calendar quarter including all quarters for the 2022 calendar year

You may have received a Form 1099 from your broker reporting certain elements of your Trust investment for 2022, such as OID interest income and principal repayment amounts. The reporting of this information on Form 1099 is required by the Internal Revenue Code in certain instances. Please note, however, that reporting the income reflected on Form 1099 and the income reflected on your income tax information statement discussed below or from this tax information reporting booklet will cause a duplication of income.

You may have already received an income tax information statement directly from your broker that is in support of the amounts as reported on your Form 1099 for your investment in the Trust for 2022. For the calendar year ending 12/31/2022, your tax information statement from your broker will provide additional detail and support for the OID interest income and principal repayment amounts as reported on your Form 1099 and it will also provide support for any applicable expenses or other items that would not have been reported to you on your Form 1099. That information would have been based upon ownership information supplied directly by you or from your broker's records. If you have received an income tax information statement that is in support of the amounts as reported on your Form 1099, you should utilize that information in conjunction with the Form 1099 in preparing your tax returns.

On the basis that your tax information statement provided by your broker has all the applicable income and expense amounts that are attributable to your investment in the Trust for the calendar year ending 12/31/2022 correctly reported on it, no further calculations would be required. For this reason, it is recommended that the Unitholders carefully review their Form 1099 and use the Form 1099 and the income tax information statement provided by their broker or nominee that is in support of the Form 1099 and use this booklet provided by the Trustee only in conjunction with the Form 1099 in the completion of their 2022 tax returns.

In the event that the items of income as reported on your Form 1099 are not reported in the correct category on the applicable Form 1099, then use this booklet to assist in the reconciliation of your taxable income to your distribution amount and to ensure that the applicable income and expense amounts are correctly reported on your tax return.

Please note that this booklet provided by the Trustee is intended to be used only as supplementary information to assist you in the preparation of your 2022 federal and state tax returns. Please use this booklet to assist you in the proper categorization and tax reporting of the distribution amounts as reported to you on your applicable Form 1099.

Unitholders are encouraged to read all of the enclosed material very carefully and to retain it as part of their tax records.

The information and instructions contained in this booklet are designed to assist Unitholders who are U.S. citizens or residents in complying with their federal and state income tax return filing requirements and should not be construed as to render professional tax advice to any specific Unitholder. You should consult your tax advisor concerning the inclusion of this information in your income tax returns and regarding all tax compliance matters relating to your investment in units in this Trust.

The Bank of New York Mellon Trust Company, N. A., Trustee

By:

Elaina C Rodgers

Tax Line phone number (512-236-6545)

VOC Energy Trust

VOC Energy Trust

EIN: 80-6183103

INCOME TAX INFORMATION - 2022

OVERVIEW

This booklet is intended to provide information necessary to the preparation of your 2022 federal and state income tax returns and has been prepared based upon the information set forth in the filings with the Securities and Exchange Commission made by the VOC Energy Trust (the "Trust"). The Trust is treated as a grantor trust for federal and state income tax purposes. As a result the Trust itself is not subject to U.S. federal income tax. Unitholders of the Trust are taxed on their prorata share of the income and expenses of the Trust as if they were the direct owners of a prorata share of the Trust's assets. Thus, the taxable year for reporting a Unitholder's share of the Trust's income and expense is controlled by the Unitholder's taxable year and method of accounting, not by the taxable year and method of accounting of the Trust. Therefore, a cash-basis Unitholder would report his prorata share of income and expense items of the Trust, received or paid by the Trust, during his tax year. The information contained in this booklet has been designed to accommodate Unitholders utilizing the cash method of accounting and reporting on a calendar (i.e., December 31) year end. Unitholders utilizing a different method of accounting or reporting on a different year end may need supplemental tax information from the Trustee. In the event such information is not currently available, the Trustee will secure such information as soon as practical.

The Trust allocates income, deductions and credits quarterly to Unitholders of record on approximately the 30th day of the month following the end of a calendar quarter. Unitholders of record on that particular date also are entitled to receive any related cash distributions, which are generally paid by the 45th day following the end of a calendar quarter.

Determination of Unitholder Taxable Income

As previously noted, Unitholders are viewed as owning a prorata share of the Trust's assets. For income tax purposes the Unitholder is viewed as owning an interest in the following assets:

Term Net Profits Interest (Term NPI)

Each Unitholder will be required to allocate his purchase price to the above component assets and then compute the appropriate items of income, deduction, or credit associated therewith. Tables A through F have been developed to facilitate Unitholders in that regard. For all items other than the allocation of purchase price in Table A, please note that these computations are a function of the length of time the units are held. The left-hand column of each Table indicates a range of acquisition dates for the units. A Unitholder should first determine which range of acquisition dates includes his or her purchase of units.

In order to then determine the appropriate amount of income, deduction, or credit associated with the purchase of units, the Unitholder moves laterally to the right-hand column that corresponds to the last record date during the year for which units were held. For example, if a Unitholder purchased units in the original offering in May 2011 and sold them in September 2022, the last record date in 2022 for which units were held would be August 1, 2022. If a Unitholder still held the units at the end of 2022, the last record date would be October 31, 2022. The right-hand columns are cumulative so only the last record date for which units were held should be used.

Once the appropriate factor has been determined, the calculations (if any) required by each Table may be performed.

An example of the tax information derived from utilizing the tables herein is contained at the end of this booklet on page 13. The example illustrates tax information results for those Unitholders who purchased their units in the original offering in May 2011 or at any time before November 2, 2021 and who still own those units as of December 31, 2022. Please see the schedule and related instructions at the end of the booklet.

**Table A Information
Purchase Price Allocation**

This table is to be used to allocate the purchase price of units acquired to the underlying component assets based on the relative fair market values of those assets. To determine the purchase price allocation, Unitholders should multiply the acquisition price for each separate acquisition of units by the appropriate factors listed below. The resulting amounts represent a Unitholder's initial income tax basis in each component asset and will be used for various tax determinations including gain or loss on any future sale of Trust units.

Table A

<u>For units acquired during the period:</u>	<u>Percentage of Purchase Price allocated to:</u>
	<u>Term NPI</u>
11/02/21 - 02/01/22	100.00%
02/02/22 - 05/02/22	100.00%
05/03/22 - 08/01/22	100.00%
08/02/22 - 10/31/22	100.00%

Table B Information Term NPI Income

This table reflects the portion of each payment received by the Trust attributable to the Term NPI that constitutes taxable interest income, per unit. **A portion of the Term NPI payments constitutes taxable interest income since the Term NPI is treated as a production payment (or mortgage loan) under Internal Revenue Code Section 636(a).** The portion of the Term NPI payments that represents a repayment of principal (as compared to interest) will be addressed in Table E.

The Term NPI is treated as indebtedness subject to Treasury Regulations applicable to contingent payment debt instruments (“CPDI”). Amounts treated as interest under the CPDI regulations are treated as original issue discount or OID for all purposes of the Internal Revenue Code. The OID interest accrual factors below (other than the OID interest accrual factor for the accrual period 11/01/22 through 12/31/22, for which the actual payment will be received in your cash distribution for the accrual period ending 01/30/2023 and distributed to you on or about 02/14/2023) represent the interest accrual for each accrual period adjusted for the difference between the projected contingent payment and the actual payment for each accrual period. See Exhibit I to determine the differences between the projected contingent payments and the actual payments.

See the 1st paragraph below Table B for the 2022 OID interest accrual factor for the accrual period 11/01/2022 through 12/31/2022. You will receive a cash distribution attributable to the accrual period 11/01/2021 through 01/31/2023 on or about 02/14/2023.

An adjustment was made to the February 1, 2022 OID interest accrual factor for the accrual period 11/02/2021 through 12/31/2021 applicable to the tax year ending 12/31/2021. Please see the 2nd paragraph below Table B.

Unitholders should multiply the number of units acquired by the appropriate factor listed below. This computation should be done for each separate acquisition of units. Individuals filing Form 1040 should report their share of OID interest income attributable to the Term NPI on Line 1, Part I, Schedule B.

Unitholders should be aware that this calculation may not completely reflect their taxable income attributable to the Term NPI. The Treasury Regulations allow for a Unitholder to allocate any difference between the Unitholder’s basis and the adjusted issue price of the debt instrument prorata to daily portions of interest income over the remaining term of the debt instrument. Unitholders should compare their per unit tax basis attributable to the Term NPI derived in Table A to \$8.69 per unit for units purchased on or between November 2, 2021 and February 1, 2022, \$8.43 per unit for units purchased on or between February 2, 2022 and May 02, 2022, \$8.17 per unit for units purchased on or between May 3, 2022 and August 01, 2022, and \$7.92 per unit for units purchased on or between August 02, 2022 and October 31, 2022. Any difference should be factored into the Term NPI calculation over the expected remaining life of the debt that matures on December 31, 2030. Please consult your tax advisor for further assistance regarding the treatment of the difference between your tax basis and the adjusted issue price.

(Table B Information continued)

As explained in detail below, the net negative adjustment for each applicable accrual period in Table B will (a) reduce the Unitholder's interest income for the taxable year on the Term NPI, and (b) to the extent of any excess net negative adjustment after the application of (a), give rise to ordinary loss. The amount treated as ordinary loss by a Unitholder is limited to the amount by which the Unitholder's total interest income inclusions on the Term NPI exceed the total amount of the Unitholder's net negative adjustments treated as ordinary loss on the Term NPI in prior taxable years.

Please note that an ordinary loss produced by a net negative adjustment is not subject to Internal Revenue Code Section 67 (the 2-percent floor on miscellaneous itemized deductions).

Table B

For Units acquired during the period:	And the last record date for which such units were held was:			
	<u>Feb 1, 2022</u>	<u>May 2, 2022</u>	<u>Aug 1, 2022</u>	<u>Oct 31, 2022</u>
Inception - 02/01/22	(0.101290)	(0.056593)	0.092502	0.237973
02/02/22 - 05/02/22		0.044697	0.193792	0.339263
05/03/22 - 08/01/22			0.149096	0.294567
08/02/22 - 10/31/22				0.145471
11/01/22- 12/31/22	See below for the OID interest accrual factor through 12/31/2022.			

For the period 11/01/2022 through 12/31/2022, the OID interest accrual factor is .107265 per unit. Under the OID interest accrual rules, this interest income factor multiplied by the number of units you held from 11/01/2022 through 12/31/2022 and prorated for days held if you purchased or sold your units in this time period is required to be included in your taxable income for the tax year ending 12/31/2022. You will receive a cash distribution attributable to the accrual period 11/01/2022 through 01/31/2023 on or about 02/14/2023.

Adjustment that was made for the 11/02/2021 - 12/31/2021 OID interest accrual factor: Please note that the OID interest accrual factor in Table B above for the accrual period ending on February 01, 2022 is for the accrual period 01/01/2022 through 02/01/2022 and excludes the OID interest income accrual of .119695 per unit for the accrual period 11/02/2021 through 12/31/2021. Even though this amount was received by you in 2022 in your 02/01/2022 distribution, under the OID interest accrual rules this amount of .119695 per unit, as stated on page 7 of the 2021 Tax Information booklet, was required to be included in your taxable interest income for the tax year ending 12/31/2021.

In the event that you did not include the OID interest income accrual of .119695 per unit for the accrual period 11/02/2021 through 12/31/2021 in your taxable interest income for the tax year ending 12/31/2021, please consult your tax advisor as to the manner of reporting this item on your applicable tax return.

Under the Treasury Regulation Section 1.1275-4(b) noncontingent bond method, the OID interest accrual for each accrual period is adjusted for any difference between the projected contingent payment as stated on the projected payment schedule and the actual contingent payment received in each accrual period. Please see Exhibit I for a schedule of the projected and actual contingent payments.

These adjustments either result in a positive adjustment when the actual payment exceeds the projected payment or a negative adjustment when the actual payment is less than the projected payment.

The amount, if any, by which the total positive adjustments on a debt instrument exceed the total negative adjustments on the debt instrument in the taxable year, is a net positive adjustment. A net positive adjustment is treated as additional interest income for the taxable year.

The amount, if any, by which the total negative adjustments on a debt instrument exceed the total positive adjustments on the debt instrument in the taxable year, is a net negative adjustment.

A net negative adjustment is taken into account in the following order: (1) the OID interest accrual for the year that would otherwise have to be accounted for is reduced; (2) any excess net negative adjustment remaining after step (1) is treated as an ordinary loss to the extent by which the Unitholder's total interest income inclusions in prior years on the debt instrument exceed the total amount of the Unitholder's net negative adjustments treated as ordinary losses in prior taxable years; (3) any excess net negative adjustment remaining after steps (1) and (2) is treated as a negative adjustment carryforward to the following year.

In general, a Unitholder treats a negative adjustment carryforward as a negative adjustment on the debt instrument on the first day of the succeeding taxable year. If a Unitholder has a negative adjustment carryforward on the debt instrument in a taxable year in which the debt instrument is sold, exchanged or retired, the negative adjustment carryforward reduces the Unitholder's amount realized on the sale, exchange or retirement.

Please note that the negative interest accrual for the record date of 02/01/2022, in Table B above, is due to the fact that the actual payment received for this accrual period was less than the projected contingent payment for the period. This difference between the actual payment received and the projected contingent payment resulted in a negative adjustment to the interest accrual for the accrual period. This negative adjustment exceeded the constant OID interest accrual for the accrual period. If you purchased your interest in the Trust in 2022 or before the record date, this negative adjustment would reduce any required prorated OID interest accrual for the time period 10/31/2022 through 12/31/2022 and then would reduce your amount realized on the sale, exchange or retirement of the Term NPI to the extent that the negative adjustment was not used to reduce any OID interest accrual.

Table C Information
Trust Administrative Expenses

This table reflects administrative and miscellaneous expenses incurred by the Trust. Unitholders should multiply the number of units acquired by the appropriate factor listed below. This computation should be done for each separate acquisition of Trust units.

Individuals filing Form 1040 should treat these as miscellaneous itemized deductions limited to the excess over 2% of adjusted gross income. Per new treasury regulations all miscellaneous itemized deductions subject to the 2% floor are eliminated and have been suspended through 2025. Please consult your tax advisor as to the manner of reporting these items.

Table C

For Units acquired during the period:	<u>And the last record date for which such units were held was:</u>			
	<u>Feb 1, 2022</u>	<u>May 2, 2022</u>	<u>Aug 1, 2022</u>	<u>Oct 31, 2022</u>
Inception - 02/01/22	0.027187	0.052080	0.077799	0.112885
02/02/22 - 05/02/22	N/A	0.024893	0.050611	0.085698
05/03/22 - 08/01/22	N/A	N/A	0.025718	0.060805
08/02/22 - 10/31/22	N/A	N/A	N/A	0.035086

Table D
State Apportionment Information

The Trust owns a Term NPI burdening properties located in the states of Kansas and Texas. The state of Kansas imposes a tax on taxable income derived from assets located within that state. Kansas has an income tax applicable to individuals and Texas does not. An individual Unitholder who is a non-resident of Kansas generally will not be subject to Kansas income tax on their share of the Trust's income, except to the extent the Trust units are employed by such Unitholder in a trade, business, profession or occupation carried on in Kansas. *Please consult your tax advisor to determine your state income tax return filing requirements with respect to any income allocated to states other than your state of residency.*

For the tax year ended 12/31/2022, the income received from your investment in the Trust is shown below in table D.

Table D

Tax Year Ended 2022	<u>Income Received from your Investment in the Trust</u>	
	From Kansas Sources:	53.57%
	From Texas Sources:	<u>46.43%</u>
		100.00%

Table E Information
Principal Repayment on the Term NPI

As previously noted, **the Term NPI is treated for income tax purposes as a mortgage loan. Consequently, a portion of each payment attributable to the Term NPI represents interest income and principal repayment.** Although it is not treated as income for tax purposes, the principal repayment portion reduces the Unitholder's tax basis in the Term NPI. Accordingly, to determine the principal repayment during the period of time you held Trust units, multiply the number of units acquired by the appropriate factor listed below in Table E. This computation should be done for each separate acquisition of Trust units.

Please note that this principal repayment factor can be used in connection with your basis calculations as presented in Table F as it takes into account the increase in your basis for the accrual of OID interest income and the decrease in your basis for the amount of the projected payments. The result of the projected payments less the accrual of OID interest based on the constant interest method equals the principal repayment on the Term NPI.

The factors below multiplied by the number of units you held at each quarterly distribution record date represents your return of principal on the mortgage loan debt obligation for your Term NPI interest in the Trust. This amount is required to be reported by the brokers and/or middleman on Form 1099-B as gross proceeds. Per Form 1099-B instructions, Box 1d on your Form 1099-B should show the cash proceeds, reduced by any commissions or transfer taxes related to the sale, for transactions involving stocks, debt, commodities, forward contracts, non-Section 1256 option contracts, or securities futures contracts.

If you sold your Trust units during the tax year ending 12/31/2022, Box 1d on Form 1099-B may also show the proceeds from the disposition of your interest in a Widely Held Fixed Investment Trust such as the Trust. Please ensure on your Form 1099-B that you segregate any gross proceeds from your return of principal for 2022 from any gross proceeds you would have received from any disposition of your Trust units for the tax year ending 12/31/2022, since these would each have a separate and different basis.

The amount of **gross proceeds attributable to your return of principal, which is the factor below as stated in Table E multiplied by the number of units you held at each record date, would have a basis equal to the return of principal amount.** Please consult your tax advisor as to the manner of reporting these items on your applicable tax return.

Table E

For Units acquired during the period:	<u>And the last record date for which such units were held was:</u>			
	<u>Feb 1, 2022</u>	<u>May 2, 2022</u>	<u>Aug 1, 2022</u>	<u>Oct 31, 2022</u>
Inception - 02/01/22	0.258782	0.518979	0.775601	1.030217
02/02/22 - 05/02/22	N/A	0.260196	0.516819	0.771434
05/03/22 - 08/01/22	N/A	N/A	0.256623	0.511238
08/02/22 - 10/31/22	N/A	N/A	N/A	0.254615

**Table F Information
Tax Basis
Gain/Loss on Sale of Units**

For income tax purposes, a Unitholder's tax basis in their Trust units is adjusted by certain items. In order to assist Unitholders derive their tax basis in their Trust units, the following table has been provided. The parenthetical reference next to each item indicates the table included in this booklet from which the appropriate information was previously derived and can be obtained. The information derived from completing Table F should be retained by Unitholders for future use and, in particular, upon sale or disposition of Trust units.

	Term NPI
Purchase Price Allocation (Table A) or Adjusted Tax Basis from Table F of the 2021 Tax Information booklet.	
<u>Less:</u>	
Principal Repayment (Table E)	()
Amortization of (Debt Basis Versus Adjusted Issue Price) (See Table B)	()
* Adjusted Tax Basis	
** Sale Price Allocation of Units Sold (Table A)	
** Gain/Loss on sale of Units	

- * As previously noted, this calculation should be performed for each separate acquisition of Trust units.
- ** This portion of the schedule should be used only upon the sale of Trust units. Your adjusted tax basis should be updated for the above items through the last record date for which you received a cash distribution. Your sales price should then be allocated to the underlying component assets sold utilizing the factors listed in Table A - Purchase Price Allocation, corresponding to your applicable sales date. These amounts will represent your allocated "sales price." Compare your allocated "sales price" to the adjusted income tax basis for the appropriate number/portion of units sold to determine your gain or loss on sale. **If the above calculation indicates that you sold units at a gain attributable to your ownership interest in the Term NPI, the gain will be treated as ordinary interest income. Any loss will be ordinary loss to the extent of interest income previously included in income, reduced by any negative adjustments above and, thereafter, capital loss.** You should consult your tax advisor for the appropriate treatment of these items.

Miscellaneous Information
(Reconciliation of Taxable Income to Distributed Cash)

The following schedule allows a Unitholder to reconcile net taxable income to net distributed cash for 2022. Simply enter the amounts previously computed from the indicated tables. This information is being presented for informational purposes only.

Term NPI Interest income – **(Table B)**
OID accrual (11/01/2022 through 12/31/2022) – **(Table B)**

Taxable income	_____
Reconciling items:	
OID Cash Distribution from 2021 Income	
Administrative Expenses – Non-Deductible (Table C)	()
OID accrual (11/01/2022 through 12/31/2022) – (Table B)	()
Term NPI Principal repayment – (Table E)	

Table F - Reconciliation

Reconciliation to Distributed Cash per unit					
	Total	1st Qtr	2nd Qtr	3rd Qtr	4th Qtr
Term NPI Interest income	0.237973	(0.101290)	0.044697	0.149096	0.145471
OID accrual 11/01/22-12/31/22	0.107265	0.000000	0.000000	0.000000	0.107265
Total Taxable income per unit	0.345239	(0.101290)	0.044697	0.149096	0.252736
 Reconciling Items:					
OID Cash Distribution from 2021 Income	0.119695	0.119695	0.000000	0.000000	0.000000
Admin & Misc. expense – (Non-Deductible)	(0.112885)	(0.027187)	(0.024893)	(0.025718)	(0.035086)
OID accrual 11/01/22-12/31/22	(0.107265)	0.000000	0.000000	0.000000	(0.107265)
Term NPI principal repayment	1.030217	0.258782	0.260196	0.256623	0.254615
Total Reconciling items	0.929761	0.351290	0.235303	0.230904	0.112264
Total Distributable Cash per unit	1.275000	0.250000	0.280000	0.380000	0.365000
9/30/22 Distributions - YTD	1.025000				
2021 4th Qtr distribution 1/30/22	<u>0.250000</u>				
Total Distributed Cash per Unit	1.275000	0.250000	0.280000	0.380000	0.365000
Difference	0.000000	0.000000	0.000000	0.000000	0.000000

**Illustrative Example -
Original Purchaser Calculations**

If you acquired your units in the initial public offering in May 2011 or at any time before November 02, 2021 and held those units through December 31, 2022, you may use the following example to help compute your 2022 items of income and deduction. Simply insert the number of units you acquired into the "Units" column in Section 2 - Information Computations. Then multiply the listed factor by the number of units to determine your appropriate 2022 amounts.

1. Purchase Price Allocation Example -2011

Cost/Unit (Estimated) 21.00

Allocation of Purchase Price	<u>2011 Alloc. %</u>	<u>Alloc. Cost/Unit</u>
Term NPI	<u>100.00%</u>	<u>21.00</u>
	<u>100.00%</u>	<u>21.00</u>

2. Information Computations - 2022

	<u>2022 Factor</u>	<u>Units</u>	=	<u>2022 Amounts</u>
Term NPI - OID Interest Income for accrual periods ending in 2022 (Table B)	0.237973	x _____	=	\$
Term NPI - OID Interest accrual for the accrual period 11/01/2022 through 12/31/2022 (Table B)	0.107265	x _____	=	\$
Trust Administrative Expense Non-Deductible (See Page 8) (Table C)	0.112885	x _____	=	\$
Return of Principal (Table E)	1.030217	x _____	=	\$

VOC Energy Trust
EIN: 80-6183103

Exhibit I
Payment schedule determined under Treasury Regulation Section 1.1275-4

The comparable yield and this contingent projected payment schedule as determined under the above referenced regulation is for tax purposes only to assist Unitholders in the interest accruals and adjustments thereof in respect of the debt instrument represented by ownership of Trust units and is not an assurance by the issuer with respect to the payments as noted below. The payment amounts below do not constitute a projection or representation regarding the actual amounts payable on the Trust units.

The Net Profits Interest is treated as indebtedness subject to Treasury Regulations applicable to contingent payment debt instruments (“CPDI”). Amounts treated as interest under the CPDI regulations are treated as original issue discount (“OID”) for all purposes of the Internal Revenue Code. The OID interest accrual factors in Table B represent the OID interest accrual for each accrual period adjusted for the differences between the projected contingent payments and the actual payments for each accrual period.

Please note that the factors for the Term NPI OID interest income as presented in Table B in this tax information booklet take into account the accrual of OID interest for each accrual period record date and the adjustments to the OID interest accruals for the differences between the actual and projected contingent payments for each accrual period record date. Also please note the separate OID interest accrual for the period 11/01/2022 through 12/31/2022.

Please note the dates below represent the accrual periods which correspond to the record dates for the payments, which is the 30th day of the month or the next succeeding business day following the end of each calendar year quarter.

This schedule represents the contingent projected payments with regards to the Term NPI only.

Units Outstanding 17,000,000

Original Loan Balance on 05-05-2011 (Issue Date) \$341,390,197

Comparable Yield on the Debt Instrument: 8.37797% compounded semi-annually.

Exhibit I (continued)
Payment schedule determined under Treasury Regulation Section 1.1275-4

05-05-2011	Projected Contingent Payment	(Reference Only)
Loan Balance		Actual Payment
\$ 341,390,197		
Record Dates		
(Accrual Period)		
08/01/2011	\$ 15,609,803	\$ 15,131,500 Return of Capital
10/31/2011	\$ 10,319,144	\$ 9,721,138
01/30/2012	\$ 11,559,889	\$ 7,615,858
04/30/2012	\$ 13,044,186	\$ 11,883,087
07/30/2012	\$ 9,469,925	\$ 10,608,758
10/30/2012	\$ 11,722,300	\$ 8,004,874
01/30/2013	\$ 13,283,579	\$ 4,447,381
04/30/2013	\$ 12,386,546	\$ 8,455,695
07/30/2013	\$ 11,487,307	\$ 7,315,573
10/30/2013	\$ 8,160,520	\$ 9,055,867
01/30/2014	\$ 11,925,372	\$ 9,880,331
04/30/2014	\$ 13,008,853	\$ 9,177,854
07/30/2014	\$ 10,659,997	\$ 6,898,298
10/30/2014	\$ 12,670,366	\$ 6,328,139
01/30/2015	\$ 11,121,697	\$ 1,794,160
04/30/2015	\$ 12,349,555	\$ 2,828,014
07/30/2015	\$ 11,735,284	\$ 2,017,494
10/30/2015	\$ 11,310,585	\$ 1,987,588

Exhibit I (continued)
Payment schedule determined under Treasury Regulation Section 1.1275-4

	Projected Contingent Payment	(Reference Only) Actual Payment
02/01/2016	\$ 10,964,827	\$ 995,839
05/02/2016	\$ 10,817,289	\$ 1,074,894
08/01/2016	\$ 10,597,850	\$ 1,696,473
10/31/2016	\$ 10,296,492	\$ 1,982,639
01/30/2017	\$ 10,022,095	\$ 1,520,044
05/01/2017	\$ 9,977,589	\$ 3,810,082
07/31/2017	\$ 9,834,312	\$ 2,140,348
10/30/2017	\$ 9,599,462	\$ 1,738,549
01/30/2018	\$ 9,383,971	\$ 2,030,150
04/30/2018	\$ 9,368,717	\$ 3,284,462
07/30/2018	\$ 9,235,634	\$ 3,676,676
10/30/2018	\$ 9,028,999	\$ 3,947,415
01/30/2019	\$ 8,846,582	\$ 2,610,130
04/30/2019	\$ 8,852,317	\$ 2,959,412
07/30/2019	\$ 8,770,952	\$ 3,751,554
10/30/2019	\$ 8,589,049	\$ 3,340,703
01/30/2020	\$ 8,408,976	\$ 2,073,260
04/30/2020	\$ 8,417,357	\$ 1,437,635
07/30/2020	\$ 8,351,763	\$ -0-
10/30/2020	\$ 8,197,240	\$ 1,495,332
02/01/2021	\$ 8,022,836	\$ 555,693
04/30/2021	\$ 7,924,047	\$ 2,332,980
07/30/2021	\$ 7,796,176	\$ 2,843,473
11/01/2021	\$ 7,659,231	\$ 3,570,150
02/01/2022	\$ 7,519,355	\$ 4,712,186
05/02/2022	\$ 7,384,681	\$ 5,183,181
08/01/2022	\$ 7,264,441	\$ 6,897,212
10/31/2022	\$ 7,139,196	\$ 6,801,470
01/30/2023	\$ 6,959,467	
04/30/2023	\$ 6,827,110	
07/30/2023	\$ 6,719,112	
10/30/2023	\$ 6,594,917	

Exhibit I (continued)
Payment schedule determined under Treasury Regulation Section 1.1275-4

	Projected Contingent Payment	(Reference Only) Actual Payment
01/30/2024	\$ 6,449,260	
04/30/2024	\$ 6,328,598	
07/30/2024	\$ 6,228,414	
10/30/2024	\$ 6,127,451	
01/30/2025	\$ 6,019,371	
04/30/2025	\$ 5,920,034	
07/30/2025	\$ 5,821,342	
10/30/2025	\$ 5,722,434	
01/30/2026	\$ 5,628,422	
04/30/2026	\$ 5,519,002	
07/30/2026	\$ 5,428,173	
10/30/2026	\$ 5,341,357	
01/30/2027	\$ 5,254,060	
04/30/2027	\$ 5,161,719	
07/30/2027	\$ 5,069,926	
10/30/2027	\$ 4,981,375	
01/30/2028	\$ 4,897,457	
04/30/2028	\$ 4,818,436	
07/30/2028	\$ 4,741,193	
10/30/2028	\$ 4,662,914	
01/30/2029	\$ 4,591,456	
04/30/2029	\$ 4,526,474	
07/30/2029	\$ 4,445,232	
10/30/2029	\$ 4,372,427	
01/30/2030	\$ 4,292,038	
04/30/2030	\$ 4,218,113	
07/30/2030	\$ 4,137,185	
10/30/2030	\$ 4,059,306	
12/31/2030	\$ 5,303,138	