



GLENN HEGAR TEXAS COMPTROLLER OF PUBLIC ACCOUNTS

P.O. Box 13528 • Austin, TX 78711-3528

December 18, 2019

Brandon Hubbard
Superintendent
Chilton Independent School District
905 Durango Street
Chilton, TX 76632

Re: Certificate for Limitation on Appraised Value of Property for School District Maintenance and Operations taxes by and between Chilton Independent School District and OCI Corona, LLC, Application 1419

Dear Superintendent Hubbard:

On November 6, 2019, the Comptroller issued written notice that OCI Corona, LLC (applicant) submitted a completed application (Application 1419) for a limitation on appraised value under the provisions of Tax Code Chapter 313.¹ This application was originally submitted on August 19, 2019, to the Chilton Independent School District (school district) by the applicant.

This presents the results of the Comptroller's review of the application and determinations required:

- 1) under Section 313.025(h) to determine if the property meets the requirements of Section 313.024 for eligibility for a limitation on appraised value under Chapter 313, Subchapter C; and
- 2) under Section 313.025(d), to issue a certificate for a limitation on appraised value of the property and provide the certificate to the governing body of the school district or provide the governing body a written explanation of the Comptroller's decision not to issue a certificate, using the criteria set out in Section 313.026.

Determination required by 313.025(h)

Sec. 313.024(a) Applicant is subject to tax imposed by Chapter 171.
Sec. 313.024(b) Applicant is proposing to use the property for an eligible project.

¹ All Statutory references are to the Texas Tax Code, unless otherwise noted.

Sec. 313.024(d) Applicant has requested a waiver to create the required number of new qualifying jobs and pay all jobs created that are not qualifying jobs a wage that exceeds the county average weekly wage for all jobs in the county where the jobs are located.

Sec. 313.024(d-2) Not applicable to Application 1419.

Based on the information provided by the applicant, the Comptroller has determined that the property meets the requirements of Section 313.024 for eligibility for a limitation on appraised value under Chapter 313, Subchapter C.

Certificate decision required by 313.025(d)

Determination required by 313.026(c)(1)

The Comptroller has determined that the project proposed by the applicant is reasonably likely to generate tax revenue in an amount sufficient to offset the school district's maintenance and operations *ad valorem* tax revenue lost as a result of the agreement before the 25th anniversary of the beginning of the limitation period, see Attachment B.

Determination required by 313.026(c)(2)

The Comptroller has determined that the limitation on appraised value is a determining factor in the applicant's decision to invest capital and construct the project in this state, see Attachment C.

Based on these determinations, the Comptroller issues a certificate for a limitation on appraised value. This certificate is contingent on the school district's receipt and acceptance of the Texas Education Agency's determination per 313.025(b-1).

The Comptroller's review of the application assumes the accuracy and completeness of the statements in the application. If the application is approved by the school district, the applicant shall perform according to the provisions of the Texas Economic Development Act Agreement (Form 50-826) executed with the school district. The school district shall comply with and enforce the stipulations, provisions, terms, and conditions of the agreement, applicable Texas Administrative Code and Chapter 313, per TAC 9.1054(i)(3).

This certificate is no longer valid if the application is modified, the information presented in the application changes, or the limitation agreement does not conform to the application. Additionally, this certificate is contingent on the school district approving and executing the agreement within a year from the date of this letter.

Note that any building or improvement existing as of the application review start date of November 6, 2019, or any tangible personal property placed in service prior to that date may not become "Qualified Property" as defined by 313.021(2) and the Texas Administrative Code.

Should you have any questions, please contact Will Counihan, Director, Data Analysis & Transparency, by email at will.counihan@cpa.texas.gov or by phone toll-free at 1-800-531-5441, ext. 6-0758, or at 512-936-0758.

Sincerely,

A handwritten signature in cursive script that reads "Lisa Craven".

Lisa Craven
Deputy Comptroller

Enclosure

cc: Will Counihan

Attachment A – Economic Impact Analysis

The following tables summarize the Comptroller’s economic impact analysis of OCI Corona, LLC (project) applying to Chilton Independent School District (district), as required by Tax Code, 313.026 and Texas Administrative Code 9.1055(d)(2).

Table 1 is a summary of investment, employment and tax impact of OCI Corona, LLC.

Applicant	OCI Corona, LLC
Tax Code, 313.024 Eligibility Category	Renewable Energy - Solar
School District	Chilton ISD
2018-2019 Average Daily Attendance	478
County	Falls
Proposed Total Investment in District	\$104,500,000
Proposed Qualified Investment	\$79,500,000
Limitation Amount	\$15,000,000
Qualifying Time Period (Full Years)	2021-2022
Number of new qualifying jobs committed to by applicant	1*
Number of new non-qualifying jobs estimated by applicant	0
Average weekly wage of qualifying jobs committed to by applicant	\$933
Minimum weekly wage required for each qualifying job by Tax Code, 313.021(5)(A)	\$1,085
Minimum annual wage committed to by applicant for qualified jobs	\$48,500
Minimum weekly wage required for non-qualifying jobs	\$722
Minimum annual wage required for non-qualifying jobs	\$37,558
Investment per Qualifying Job	\$104,500,000
Estimated M&O levy without any limit (15 years)	\$4,643,580
Estimated M&O levy with Limitation (15 years)	\$2,189,928
Estimated gross M&O tax benefit (15 years)	\$2,453,651

* Applicant is requesting district to waive requirement to create minimum number of qualifying jobs pursuant to Tax Code, 313.025 (f-1).

Table 2 is the estimated statewide economic impact of OCI Corona, LLC (modeled).

Year	Employment			Personal Income		
	Direct	Indirect + Induced	Total	Direct	Indirect + Induced	Total
2020	150	188	338	\$7,500,000	\$17,500,000	\$25,000,000
2021	150	196	346	\$7,500,000	\$20,500,000	\$28,000,000
2022	1	23	24	\$48,500	\$4,951,500	\$5,000,000
2023	1	7	8	\$48,500	\$2,951,500	\$3,000,000
2024	1	(6)	-5	\$48,500	\$951,500	\$1,000,000
2025	1	(12)	-11	\$48,500	-\$48,500	\$0
2026	1	(13)	-12	\$48,500	-\$48,500	\$0
2027	1	(11)	-10	\$48,500	-\$48,500	\$0
2028	1	(8)	-7	\$48,500	-\$48,500	\$0
2029	1	(5)	-4	\$48,500	-\$48,500	\$0
2030	1	(2)	-1	\$48,500	-\$48,500	\$0
2031	1	0	1	\$48,500	-\$48,500	\$0
2032	1	2	3	\$48,500	\$951,500	\$1,000,000
2033	1	4	5	\$48,500	\$951,500	\$1,000,000
2034	1	5	6	\$48,500	\$951,500	\$1,000,000
2035	1	5	6	\$48,500	\$951,500	\$1,000,000

Source: CPA REMI, OCI Corona, LLC

Table 3 examines the estimated direct impact on ad valorem taxes to the region if all taxes are assessed.

Year	Estimated Taxable Value for I&S	Estimated Taxable Value for M&O	Tax Rate*	Chilton ISD I&S Tax Levy	Chilton ISD M&O Tax Levy	Chilton ISD M&O and I&S Tax Levies	Falls County Tax Levy	Estimated Total Property Taxes
			0.2290	0.2290	0.9700		0.9480	
2022	\$69,319,520	\$69,319,520		\$158,742	\$672,399	\$831,141	\$657,149	\$1,488,290
2023	\$63,792,588	\$63,792,588		\$146,085	\$618,788	\$764,873	\$604,754	\$1,369,627
2024	\$57,829,828	\$57,829,828		\$132,430	\$560,949	\$693,380	\$548,227	\$1,241,606
2025	\$51,386,888	\$51,386,888		\$117,676	\$498,453	\$616,129	\$487,148	\$1,103,276
2026	\$44,434,200	\$44,434,200		\$101,754	\$431,012	\$532,766	\$421,236	\$954,002
2027	\$36,927,412	\$36,927,412		\$84,564	\$358,196	\$442,760	\$350,072	\$792,832
2028	\$28,822,172	\$28,822,172		\$66,003	\$279,575	\$345,578	\$273,234	\$618,812
2029	\$20,066,736	\$20,066,736		\$45,953	\$194,647	\$240,600	\$190,233	\$430,833
2030	\$15,192,300	\$15,192,300		\$34,790	\$147,365	\$182,156	\$144,023	\$326,179
2031	\$15,182,100	\$15,182,100		\$34,767	\$147,266	\$182,033	\$143,926	\$325,960
2032	\$15,172,100	\$15,172,100		\$34,744	\$147,169	\$181,913	\$143,832	\$325,745
2033	\$15,162,400	\$15,162,400		\$34,722	\$147,075	\$181,797	\$143,740	\$325,537
2034	\$15,152,900	\$15,152,900		\$34,700	\$146,983	\$181,683	\$143,649	\$325,333
2035	\$15,143,700	\$15,143,700		\$34,679	\$146,894	\$181,573	\$143,562	\$325,135
2036	\$15,134,700	\$15,134,700		\$34,658	\$146,807	\$181,465	\$143,477	\$324,942
			Total	\$1,096,268	\$4,643,580	\$5,739,847	\$4,538,261	\$10,278,109

Source: CPA, OCI Corona, LLC

*Tax Rate per \$100 Valuation

Table 4 examines the estimated direct impact on ad valorem taxes to the school district and Falls County, with all property tax incentives sought being granted using estimated market value from the application. The project has applied for a value limitation under Chapter 313, Tax Code and tax abatement with the county.

The difference noted in the last line is the difference between the totals in Table 3 and Table 4.

Year	Estimated Taxable Value for I&S	Estimated Taxable Value for M&O		Chilton ISD I&S Tax Levy	Chilton ISD M&O Tax Levy	Chilton ISD M&O and I&S Tax Levies	Falls County Tax Levy	Estimated Total Property Taxes
			Tax Rate*	0.2290	0.9700		0.9480	
2022	\$69,319,520	\$15,000,000		\$158,742	\$145,500	\$304,242	\$98,572	\$402,814
2023	\$63,792,588	\$15,000,000		\$146,085	\$145,500	\$291,585	\$90,713	\$382,298
2024	\$57,829,828	\$15,000,000		\$132,430	\$145,500	\$277,930	\$82,234	\$360,164
2025	\$51,386,888	\$15,000,000		\$117,676	\$145,500	\$263,176	\$73,072	\$336,248
2026	\$44,434,200	\$15,000,000		\$101,754	\$145,500	\$247,254	\$63,185	\$310,440
2027	\$36,927,412	\$15,000,000		\$84,564	\$145,500	\$230,064	\$52,511	\$282,575
2028	\$28,822,172	\$15,000,000		\$66,003	\$145,500	\$211,503	\$40,985	\$252,488
2029	\$20,066,736	\$15,000,000		\$45,953	\$145,500	\$191,453	\$28,535	\$219,988
2030	\$15,192,300	\$15,000,000		\$34,790	\$145,500	\$180,290	\$21,603	\$201,894
2031	\$15,182,100	\$15,000,000		\$34,767	\$145,500	\$180,267	\$21,589	\$201,856
2032	\$15,172,100	\$15,172,100		\$34,744	\$147,169	\$181,913	\$143,832	\$325,745
2033	\$15,162,400	\$15,162,400		\$34,722	\$147,075	\$181,797	\$143,740	\$325,537
2034	\$15,152,900	\$15,152,900		\$34,700	\$146,983	\$181,683	\$143,649	\$325,333
2035	\$15,143,700	\$15,143,700		\$34,679	\$146,894	\$181,573	\$143,562	\$325,135
2036	\$15,134,700	\$15,134,700		\$34,658	\$146,807	\$181,465	\$143,477	\$324,942
			Total	\$1,096,268	\$2,189,928	\$3,286,196	\$1,291,260	\$4,577,456
			Diff	\$0	\$2,453,651	\$2,453,651	\$3,247,001	\$5,700,653

Source: CPA, OCI Corona, LLC

*Tax Rate per \$100 Valuation

Disclaimer: This examination is based on information from the application submitted to the school district and forwarded to the comptroller. It is intended to meet the statutory requirement of Chapter 313 of the Tax Code and is not intended for any other purpose.

Attachment B – Tax Revenue before 25th Anniversary of Limitation Start

This represents the Comptroller’s determination that OCI Corona, LLC (project) is reasonably likely to generate, before the 25th anniversary of the beginning of the limitation period, tax revenue in an amount sufficient to offset the school district maintenance and operations ad valorem tax revenue lost as a result of the agreement. This evaluation is based on an analysis of the estimated M&O portion of the school district property tax levy directly related to this project, using estimated taxable values provided in the application.

	Tax Year	Estimated ISD M&O Tax Levy Generated (Annual)	Estimated ISD M&O Tax Levy Generated (Cumulative)	Estimated ISD M&O Tax Levy Loss as Result of Agreement (Annual)	Estimated ISD M&O Tax Levy Loss as Result of Agreement (Cumulative)
Limitation Pre-Years	2016	\$0	\$0	\$0	\$0
	2020	\$0	\$0	\$0	\$0
	2021	\$121,250	\$121,250	\$0	\$0
Limitation Period (10 Years)	2022	\$145,500	\$266,750	\$526,899	\$526,899
	2023	\$145,500	\$412,250	\$473,288	\$1,000,187
	2024	\$145,500	\$557,750	\$415,449	\$1,415,637
	2025	\$145,500	\$703,250	\$352,953	\$1,768,590
	2026	\$145,500	\$848,750	\$285,512	\$2,054,101
	2027	\$145,500	\$994,250	\$212,696	\$2,266,797
	2028	\$145,500	\$1,139,750	\$134,075	\$2,400,872
	2029	\$145,500	\$1,285,250	\$49,147	\$2,450,020
	2030	\$145,500	\$1,430,750	\$1,865	\$2,451,885
	2031	\$145,500	\$1,576,250	\$1,766	\$2,453,651
	Maintain Viable Presence (5 Years)	2032	\$147,169	\$1,723,419	\$0
2033		\$147,075	\$1,870,495	\$0	\$2,453,651
2034		\$146,983	\$2,017,478	\$0	\$2,453,651
2035		\$146,894	\$2,164,372	\$0	\$2,453,651
2036		\$146,807	\$2,311,178	\$0	\$2,453,651
Additional Years as Required by 313.026(c)(1) (10 Years)	2037	\$146,721	\$2,457,899	\$0	\$2,453,651
	2038	\$146,639	\$2,604,538	\$0	\$2,453,651
	2039	\$146,558	\$2,751,097	\$0	\$2,453,651
	2040	\$146,480	\$2,897,576	\$0	\$2,453,651
	2041	\$146,403	\$3,043,979	\$0	\$2,453,651
	2042	\$139,158	\$3,183,137	\$0	\$2,453,651
	2043	\$139,085	\$3,322,223	\$0	\$2,453,651
	2044	\$139,015	\$3,461,237	\$0	\$2,453,651
	2045	\$138,945	\$3,600,182	\$0	\$2,453,651
	2046	\$138,877	\$3,739,059	\$0	\$2,453,651

\$3,739,059

is greater than

\$2,453,651

Analysis Summary	
Is the project reasonably likely to generate tax revenue in an amount sufficient to offset the M&O levy loss as a result of the limitation agreement?	Yes

Source: CPA, OCI Corona, LLC

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Attachment C – Limitation as a Determining Factor

Tax Code 313.026 states that the Comptroller may not issue a certificate for a limitation on appraised value under this chapter for property described in an application unless the comptroller determines that “the limitation on appraised value is a determining factor in the applicant’s decision to invest capital and construct the project in this state.” This represents the basis for the Comptroller’s determination.

Methodology

Texas Administrative Code 9.1055(d) states the Comptroller shall review any information available to the Comptroller including:

- the application, including the responses to the questions in Section 8 (Limitation as a Determining Factor);
- public documents or statements by the applicant concerning business operations or site location issues or in which the applicant is a subject;
- statements by officials of the applicant, public documents or statements by governmental or industry officials concerning business operations or site location issues;
- existing investment and operations at or near the site or in the state that may impact the proposed project;
- announced real estate transactions, utility records, permit requests, industry publications or other sources that may provide information helpful in making the determination; and
- market information, raw materials or other production inputs, availability, existing facility locations, committed incentives, infrastructure issues, utility issues, location of buyers, nature of market, supply chains, other known sites under consideration.

Determination

The Comptroller **has determined** that the limitation on appraised value is a determining factor in the OCI Corona, LLC’s decision to invest capital and construct the project in this state. This is based on information available, including information provided by the applicant. Specifically, the comptroller notes the following:

- Per OCI Company Ltd (parent company of OCI Corona, LLC and OCI Solar Power) in Tab 5 of their Application for a Limitation on Appraised Value:
 - A. “Founded in 1959, OCI Company LTD is a green energy and chemical company with global operations in both the US and Asia. In 2012 OCI Solar was formed as the solar power platform for the companies green energy business segment. OCI provides a one-stop solar PV business solution by financing with OCI Solar PV Fund, as well as project development based on its experience in the development and operation of 20 MW solar PV plants in the domestic solar PV market. OCI also executes an Energy Storage Solution business for frequency regulation and peak shaving in Korea and the United States and is preparing to advance into the PV+ESS business, which is connected to solar PV plant.”
 - B. “As a global solar developer, OCI Solar Power has the optionality to locate projects of this type in both the United States market and international locations with favorable solar characteristics. The Applicant is actively assessing locations in Georgia and New Jersey in the US and developing other projects that are competing for limited investment funds. With Texas wholesale electricity prices already below the international average, it is necessary to limit the property tax liabilities for a solar project in order to be able to offer electricity at price that are marketable to Texas customers at a competitive rates. Markets such as California that have statewide available subsidies for renewable energy projects, and which have higher average contracted power rates, offer an attractive incentive for developers to build projects in those markets over Texas.”
 - C. “The property tax liability of a project without tax incentives in Texas would reduce the return to investors and financiers to an unacceptable level at today’s contracted power rates under a power purchase agreement (PPA). Without the 313 Value Limitation, the applicant would be forced to walk away from this project and spend the potential investment in other states where the rate of return is higher.”

Supporting Information

- a) Section 8 of the Application for a Limitation on Appraised Value
- b) Attachments provided in Tab 5 of the Application for a Limitation on Appraised Value
- c) Additional information provided by the Applicant or located by the Comptroller

Disclaimer: This examination is based on information from the application submitted to the school district and forwarded to the comptroller. It is intended to meet the statutory requirement of Chapter 313 of the Tax Code and is not intended for any other purpose.

Supporting Information

**Section 8 of the Application for
a Limitation on Appraised Value**

SECTION 6: Eligibility Under Tax Code Chapter 313.024

1. Are you an entity subject to the tax under Tax Code, Chapter 171? Yes No
2. The property will be used for one of the following activities:
 - (1) manufacturing Yes No
 - (2) research and development Yes No
 - (3) a clean coal project, as defined by Section 5.001, Water Code Yes No
 - (4) an advanced clean energy project, as defined by Section 382.003, Health and Safety Code Yes No
 - (5) renewable energy electric generation Yes No
 - (6) electric power generation using integrated gasification combined cycle technology Yes No
 - (7) nuclear electric power generation Yes No
 - (8) a computer center that is used as an integral part or as a necessary auxiliary part for the activity conducted by applicant in one or more activities described by Subdivisions (1) through (7) Yes No
 - (9) a Texas Priority Project, as defined by 313.024(e)(7) and TAC 9.1051 Yes No
3. Are you requesting that any of the land be classified as qualified investment? Yes No
4. Will any of the proposed qualified investment be leased under a capitalized lease? Yes No
5. Will any of the proposed qualified investment be leased under an operating lease? Yes No
6. Are you including property that is owned by a person other than the applicant? Yes No
7. Will any property be pooled or proposed to be pooled with property owned by the applicant in determining the amount of your qualified investment? Yes No

SECTION 7: Project Description

1. In **Tab 4**, attach a detailed description of the scope of the proposed project, including, at a minimum, the type and planned use of real and tangible personal property, the nature of the business, a timeline for property construction or installation, and any other relevant information.
2. Check the project characteristics that apply to the proposed project:

<input checked="" type="checkbox"/> Land has no existing improvements	<input type="checkbox"/> Land has existing improvements (<i>complete Section 13</i>)
<input type="checkbox"/> Expansion of existing operation on the land (<i>complete Section 13</i>)	<input type="checkbox"/> Relocation within Texas

SECTION 8: Limitation as Determining Factor

1. Does the applicant currently own the land on which the proposed project will occur? Yes No
2. Has the applicant entered into any agreements, contracts or letters of intent related to the proposed project? Yes No
3. Does the applicant have current business activities at the location where the proposed project will occur? Yes No
4. Has the applicant made public statements in SEC filings or other documents regarding its intentions regarding the proposed project location? Yes No
5. Has the applicant received any local or state permits for activities on the proposed project site? Yes No
6. Has the applicant received commitments for state or local incentives for activities at the proposed project site? Yes No
7. Is the applicant evaluating other locations not in Texas for the proposed project? Yes No
8. Has the applicant provided capital investment or return on investment information for the proposed project in comparison with other alternative investment opportunities? Yes No
9. Has the applicant provided information related to the applicant's inputs, transportation and markets for the proposed project? Yes No
10. Are you submitting information to assist in the determination as to whether the limitation on appraised value is a determining factor in the applicant's decision to invest capital and construct the project in Texas? Yes No

Chapter 313.026(e) states "the applicant may submit information to the Comptroller that would provide a basis for an affirmative determination under Subsection (c)(2)." If you answered "yes" to any of the questions in Section 8, attach supporting information in Tab 5.

Supporting Information

Attachments provided in Tab 5
of the Application for a
Limitation on Appraised Value



TAB 5

Documentation to assist in determining if limitation is a determining factor.

Founded in 1959, OCI Company Ltd is a green energy and chemical company with global operations in both the U.S and Asia. In 2012 OCI Solar was formed as the solar power platform for the companies green energy business segment. OCI Solar joined a large-scale solar PV project with a total of 560 MW in Texas in 2012. The “Alamo Project” entailed the construction of eight solar PV plants between 2012 and 2017, and this is North America’s largest solar PV project, which can provide electricity to 70,000 households. The Alamo project is meaningful in that OCI, which entered the renewable energy field at an early time by developing Korea’s first polysilicon, was the first Korean company to advance into the North American solar PV market and was recognized for its business capability and opened the era of solar power in earnest.

Later, OCI advanced into China’s decentralized solar PV generation market by constructing a 2.6 MW solar PV plant in Jiaying, Zhejiang, China in 2015. It has been pioneering the Chinese market while constructing solar PV plants with a high availability rate and durability, one by one, in a close network with local governments in China. OCI provides a one-stop solar PV business solution by diversifying business areas from the construction, operation and maintenance(O&M) to project financing with OCI Solar PV Fund, as well as project development based on its experience in the development and operation of 20 MW solar PV plants in the domestic solar PV market.

OCI also executes an Energy Storage Solution business for frequency regulation and peak shaving in Korea and the United States and is preparing to advance into the PV+ESS business, which is connected to solar PV plant.

As a global solar developer, OCI Solar Power has the optionality to locate projects of this type in both the United States market and international locations with favorable solar characteristics. The Applicant is actively assessing locations in Georgia and New Jersey in the US and developing other projects that are competing for limited investment funds. With Texas wholesale electricity prices already below the international average, it is necessary to limit the property tax liabilities for a solar project in order to be able to offer electricity at prices that are marketable to Texas customers at competitive rates. Markets such as California that have statewide available subsidies for renewable energy projects, and which have higher average contracted power rates, offer an attractive incentive for developers to build projects in those markets over Texas.

The property tax liability of a project without tax incentives in Texas would reduce the return to investors and financiers to an unacceptable level at today's contracted power rates under a power purchase agreement (PPA). Without the 313 Value Limitation, the applicant would be forced to walk away from this project and spend the potential investment in other states where the rate of return is higher.

Supporting Information

Additional information
provided by the Applicant or
located by the Comptroller

COMPTROLLER QUERY RELATED TO TAX CODE CHAPTER 313.026(c)(2)
Chilton ISD-OCI Corona, LLC App. #1419

Comptroller Questions (via Tab 4 of application email on October 3, 2019):

1. *Is the OCI Corona, LLC currently known by any other project names?*
2. *Has this project applied to ERCOT at this time? If so, please provide the project's IGNR number and when was it assigned.*
3. *Please also list any other names by which this project may have been known in the past-in media reports, investor presentations, or any listings with any federal or state agency*

Applicant Response (via email on October 4, 2019 and Tab 4 of application):

1. *The project is also known by the names Spanish Crown and OCI Alamo 9 LLC.*
2. *The Project IGNR Number is 21INR0323 and was assigned on April 16, 2019.*
3. *The project is also known by the names Spanish Crown and OCI Alamo 9 LLC.*