

O'HANLON, DEMERATH & CASTILLO

ATTORNEYS AND COUNSELORS AT LAW

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426 W. Caffery Ave.
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117 W. Craig Place
San Antonio, Texas 78212

July 23, 2025

Local Government Assistance & Economic
Analysis Texas Comptroller of Public Accounts
P.O. Box 13528
Austin, Texas 78711-3528

RE: 1550-Amendment003_Execution002 of the Application to the Port Arthur
Independent School District from GT Logistics

To the Local Government Assistance & Economic Analysis Division:

Please find attached Amendment003_Execution002 of the Application to the Port Arthur
Independent School District from GT Logistics. The following changes have been made:

1. Section 2: Authorized Company Official – Updated Email Address
2. Section 14: Updated commitment for qualified jobs to 1 new job [pursuant
to a request for a job waiver
3. Schedule C: Updated number of qualified jobs to reflect job waiver down
to 1

A copy of the application will be submitted to the Jefferson County Appraisal District.

Sincerely,



Kevin O'Hanlon
School District Consultant

Cc: Jefferson CAD
GT Logistics

Texas Comptroller of Public Accounts

Data Analysis and
Transparency
Form 50.296-A

SECTION 1: School District Information (continued)

3. Authorized School District Consultant (If Applicable)

Kevin O'Hanlon
First Name Last Name
Partner
Title
O'Hanlon, Demerath & Castillo
Firm Name
512-494-9949
Phone Number
Fax Number
kohanlon@808west.com
Email Address
Mobile Number (optional)
12/20/2020
4. On what date did the district determine this application complete?

SECTION 2: Applicant Information

1. Authorized Company Representative (Applicant)

Frank Quintana
First Name Last Name
Vice President of Tax
Title
16211 La Cantera Parkway, Suite 202
Street Address
16211 La Cantera Parkway, Suite 202
Mailing Address
San Antonio Texas 78256
City State ZIP
210-944-0869
Phone Number
Fax Number
720-272-1989
Business Email Address
fquintana@howardep.com
Mobile Number (optional)
2. Will a company official other than the authorized company representative be responsible for responding to future information requests? ☒ Yes ☐ No

2a. If yes, please fill out contact information for that person.

John Spillner
First Name Last Name
Sr. Manager, Property Tax
Title
16211 La Cantera Parkway, Suite 202
Street Address
16211 La Cantera Parkway, Suite 202
Mailing Address
San Antonio Texas 78256
City State ZIP
210-634-1325
Phone Number
Fax Number
303-929-6715
Business Email Address
jspillner1@howardep.com
Mobile Number (optional)
3. Does the applicant authorize the consultant to provide and obtain information related to this application? ☒ Yes ☐ No

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SECTION 14: Wage and Employment Information

1. What is the number of new qualifying jobs you are committing to create? 1
2. What is the number of new non-qualifying jobs you are estimating you will create? (See TAC 9.1051(14)) 50
3. Do you intend to request that the governing body waive the minimum new qualifying job creation requirement, as provided under Tax Code §313.025(f-1)? ☒ Yes ☐ No
 - 3a. If yes, attach evidence of industry standard in Tab 12 documenting that the new qualifying job creation requirement above exceeds the number of employees necessary for the operation, according to industry standards.
4. Attach in Tab 13 the four most recent quarters of data for each wage calculation below, including documentation from the Texas Workforce Commission website. The final actual statutory minimum annual wage requirement for the applicant for each qualifying job — which may differ slightly from this estimate — will be based on information available at the time of the application review start date (date of a completed application). See TAC §9.1051(21) and (22). Note: If a more recent quarter of information becomes available before the application is deemed complete, updated wage information will be required.
 - a. Non-qualified job wages
- average weekly wage for all jobs (all industries) in the county is \$ 1,120.00
 - b. Qualifying job wage minimum option §313.021(5)(A)
- 110% of the average weekly wage for manufacturing jobs in the county is \$ 2,240.15
 - c. Qualifying job wage minimum option §313.021(5)(B)
- 110% of the average weekly wage for manufacturing jobs in the region is \$ 1,122.83
5. Which Tax Code section are you using to estimate the qualifying job wage standard required for this project? ☐ §313.021(5)(A) or ☒ §313.021(5)(B)
6. What is the minimum required annual wage for each qualifying job based on the qualified property? \$ 58,386.90
7. What is the annual wage you are committing to pay for each of the new qualifying jobs you create on the qualified property? \$ 58,387.00
8. Will the qualifying jobs meet all minimum requirements set out in Tax Code §313.021(3)? ☒ Yes ☐ No
9. Do you intend to satisfy the minimum qualifying job requirement through a determination of cumulative economic benefits to the state as provided by §313.021(3)(F)? ☐ Yes ☒ No
 - 9a. If yes, attach in Tab 13 supporting documentation from the TWC, pursuant to §313.021(3)(F).
10. Do you intend to rely on the project being part of a single unified project, as allowed in §313.024(d-2), in meeting the qualifying job requirements? ☐ Yes ☒ No
 - 10a. If yes, attach in Tab 6 supporting documentation including a list of qualifying jobs in the other school district(s).

SECTION 15: Economic Impact

1. Complete and attach Schedules A1, A2, B, and C in Tab 14. Note: Excel spreadsheet versions of schedules are available for download and printing at URL listed below.
2. Attach an Economic Impact Analysis, if supplied by an entity other than the Comptroller's office, in Tab 15. (not required)
3. If there are any other payments made in the state or economic information that you believe should be included in the economic analysis, attach a separate schedule showing the amount for each year affected, including an explanation, in Tab 15



**16211 La Cantera Parkway, Suite 202
San Antonio, TX 78256
210-298-2222**

June 26, 2025

Dr. Mark Porterie
Superintendent
Port Arthur Independent School District
4801 9th Avenue
Port Arthur, TX 77642

**Re: Chapter 313 Jobs Waiver Request
Port Arthur ISD No. 1550, GT Logistics, LLC**

Dear Superintendent Porterie,

GT Logistics, LLC respectfully requests that the Port Arthur Independent School District's Board of Trustees waive the new qualifying jobs requirement provision as allowed by Section 313.025(f-1) of the Texas Tax Code. This waiver would be based on the school district's board findings that the new qualifying jobs creation requirement exceeds the industry standard for the number of employees reasonably necessary for the operation of the facility whose property owner is described in the application.

GT Logistics, LLC is a wholly owned indirect subsidiary of Howard Midstream Energy Partners, LLC which, together with its subsidiaries (collectively, "Howard Energy Partners"), operates midstream oil & gas assets in Texas, New Mexico, Oklahoma, Pennsylvania, and Mexico. As is common with many large companies in this industry, Howard Energy Partners is required to post all open positions internally to ensure its personnel are fully aware of these opportunities. At the same time, open positions are also posted externally. The ultimate goal is to find, employ, and retain the best talent possible for available positions. Often times, the best qualified candidate is an internal candidate.

To operate the project facility in the safest and most efficient manner, experienced and advanced skillsets are required. As a result, there are specific, necessary qualifications needed for project personnel, which limits the talent pool from which to hire permanent, full-time job holders that can perform the duties necessary to operate this renewable fuels feedstock processing facility. In order to find, employ, and retain the best experienced and most advanced personnel necessary to operate the project facility, and in line with Howard Energy Partners and industry standard hiring practices, all of the open positions required to operate the project facility were and will be posted internally. Additionally, a number of those positions were and will be filled internally.

Dr. Mark Porterie
Port Arthur Independent School District
June 26, 2025
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For a permanent full-time job to be recognized as a "qualifying job" under Section 313.021(3) of the Texas Tax Code, a requirement is that the job "is not transferred from one area in this state to another area in this state". To the extent the open positions required to operate the project facility were and will be filled internally by Howard Energy Partners personnel from other Texas locations, those jobs may not satisfy one or more of the requirements of Section 313.021(3) of the Texas Tax Code. Thus, while the project facility has created and retained over 10 permanent full-time jobs at or above the minimum county average weekly wage for manufacturing jobs standard for new qualifying jobs (and will continue to do so through the end of the Maintain Viable Presence period), several of those jobs were filled internally from other Texas locations. Regardless of the fact that the existing vacated positions were backfilled and resulted in a net increase to the overall number of Texas jobs, those jobs may not satisfy all of the requirements of Section 313.021(3) of the Texas Tax Code. As positions at facilities similar to the project facility are routinely filled internally in this industry, the number of "new qualifying jobs" reasonably necessary for the operation of the project facility exceeds the industry standard for the number of "new qualifying jobs" reasonably necessary for the operation of the project facility.

Based upon Howard Energy Partners' experience as the operator of similar facilities, its general knowledge of competitors' operations and hiring practices, and its own operations and hiring practices, Howard Energy Partners has determined that one (1) new qualifying job is the industry standard staffing requirement for the project facility that is the subject of the application.

Accordingly, Howard Energy Partners respectfully requests that the Board of Trustees make such a finding and waive the job creation requirement for 10 new qualifying jobs and set the job creation standard for the project facility at one (1) new qualifying job.

Sincerely,



Frank Quintana
Vice President of Tax
Howard Energy Partners

Schedule C: Employment Information

Date 25-Jun-25
Applicant Name GT Logistics LLC
ISD Name Port Arthur

Form 50-296A

Revised February 2020

				Construction		Non-Qualifying Jobs	Qualifying Jobs	
				Column A	Column B	Column C	Column D	Column E
	Year	School Year (YYYY-YYYY)	Tax Year (Actual tax year) YYYY	Number of Construction FTE's	Average annual wage rates for construction workers	Number of non-qualifying jobs applicant estimates it will create (cumulative)	Number of new qualifying jobs applicant commits to create meeting all criteria of Sec. 313.021(3) (cumulative)	Annual wage of new qualifying jobs
Each year prior to start of Value Limitation Period <i>Insert as many rows as necessary</i>	0	2021-2022	2021	200 FTE	\$65,000	0	0	
Each year prior to start of Value Limitation Period <i>Insert as many rows as necessary</i>	0	2022-2023	2022	800 FTE	\$65,000	0	0	
Value Limitation Period <i>The qualifying time period could overlap the value limitation period.</i>	1	2023-2024	2023			50	10	\$58,387
	2	2024-2025	2024	300 FTE	\$65,000	50	10	\$58,387
	3	2025-2026	2025	300 FTE	\$65,000	50	1	\$58,387
	4	2026-2027	2026			50	1	\$58,387
	5	2027-2028	2027			50	1	\$58,387
	6	2028-2029	2028			50	1	\$58,387
	7	2029-2030	2029			50	1	\$58,387
	8	2030-2031	2030			50	1	\$58,387
	9	2031-2032	2031			50	1	\$58,387
	10	2032-2033	2032			50	1	\$58,387
Years Following Value Limitation Period	11 through 25	2033 - 2048	2033 - 2047			50	1	\$58,387

Notes: See TAC 9.1051 for definition of non-qualifying jobs.
Only include jobs on the project site in this school district.

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SECTION 16: Authorized Signatures and Applicant Certification

After the application and schedules are complete, an authorized representative from the school district and the business should review the application documents and complete this authorization page. Attach the completed authorization page in Tab 17.

NOTE: If you amend your application, you will need to obtain new signatures and resubmit this page. Section 16, with the amendment request.

1. Authorized School District Representative Signature

I am the authorized representative for the school district to which this application is being submitted. I understand that this application is a government record as defined in Chapter 37 of the Texas Penal Code.

print
here

Dr. Mark Porterie

Print Name (Authorized School District Representative)

Superintendent

Title

sign
here

Dr. Mark Porterie

Signature (Authorized School District Representative)

June 26, 2025

Date

2. Authorized Company Representative (Applicant) Signature and Notarization

I am the authorized representative for the business entity for the purpose of filing this application. I understand that this application is a government record as defined in Chapter 37 of the Texas Penal Code. The information contained in this application and schedules is true and correct to the best of my knowledge and belief.

I hereby certify and affirm that the business entity I represent is in good standing under the laws of the state in which the business entity was organized and that no delinquent taxes are owed to the State of Texas.

print
here

Frank Quintana

Print Name (Authorized Company Representative (Applicant))

Vice President of Tax

Title

sign
here

Frank Quintana

Signature (Authorized Company Representative (Applicant))

6/26/2025

Date



(Notary Seal)

GIVEN under my hand and seal of office this, the

26th day of *June*, *2025*

Lucy Ridout

Notary Public in and for the State of Texas

My Commission expires *3-8-2029*

If you make a false statement on this application, you could be found guilty of a Class A misdemeanor or a state jail felony under Texas Penal Code Section 37.10.