

# O'HANLON, DEMERATH & CASTILLO

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September 29, 2025

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

RE: (2083) Amendment002 Execution 1 of the Application to the Beaumont Independent School District from Linde Inc.

To the Local Government Assistance & Economic Analysis Division:

Enclosed. Please find Amendment002 Execution 1 of the Application to the Beaumont Independent School District from Linde Inc. The following changes have been made:

1. Section 9: Projected Timeline
  - Question 3: Limitation Start Period is moved to January 1, 2027
  - Question 5: Commencement of Commercial Operations begins December 2026
2. Tab 14: Schedules A1 – C updated to new timeline
3. New signature page

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

Sincerely,



Kevin O'Hanlon  
School District Consultant

Cc: Jefferson CAD  
Linde Inc



**CUMMINGS WESTLAKE**  
PROPERTY TAX ADVISORS

September 25, 2025

Kathy Mathias  
Moak Casey and Associates  
1001 Congress Avenue, Suite 250  
Austin, Texas 78701

Dan;

Attached please find Amended Application pages for Linde Inc. (Application # 2083 in Beaumont ISD).

The changes to the original Application are as follows and are a result of the delay in the commencement of commercial operations of the project.

1. **Section 9: Question 4:**  
The first year of limitation is amended to January 1, 2027.
2. **Section 9: Question 5**  
Commencement of commercial operations is amended to December 2026
3. **Tab 14: Schedules:**  
Schedules A1, A2, B, and C have been amended to reflect the commencement of commercial operations, and the Value Limitation Start Date.

Please let me know if you have questions or need additional information.

Sincerely,

Sam A. Gregson  
Senior Consultant

SECTION 1: School District Information (*continued*)3. Authorized School District Consultant (*If Applicable*)

Dan  
First Name  
Partner  
Title  
Moak Casey & Associates  
Firm Name  
512-485-7878  
Phone Number  
N/A  
Mobile Number (*optional*)

4. On what date did the district determine this application complete? ..... June 29, 2022

## SECTION 2: Applicant Information

1. Authorized Company Representative (*Applicant*)

Mike  
First Name  
Manager - Government Affairs  
Title  
1585 Sawdust Road, Suite 300  
Street Address  
1585 Sawdust Road, Suite 300  
Mailing Address  
The Woodlands  
City  
281-465-6881  
Phone Number  
N/A  
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.

Amer  
First Name  
Vice President, South Region  
Title  
1585 Sawdust Road, Suite 300  
Street Address  
1585 Sawdust Road, Suite 300  
Mailing Address  
The Woodlands  
City  
281-203-3522  
Phone Number  
N/A  
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 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.

## SECTION 9: Projected Timeline

NOTE: Only construction beginning after the application review start date (the date the Texas Comptroller of Public Accounts deems the application complete) can be considered qualified property and/or qualified investment.

1. Estimated school board ratification of final agreement ..... September 2022

2. Estimated commencement of construction ..... March 2023

3. Beginning of qualifying time period (MM/DD/YYYY) ..... January 1, 2024

4. First year of limitation (YYYY) ..... January 1, 2027

4a. For the beginning of the limitation period, note which one of the following will apply according to provision of 313.027(a-1)(2):

A. January 1 following the application date  B. January 1 following the end of QTP  
 C. January 1 following the commencement of commercial operations

5. Commencement of commercial operations ..... December 2026

## SECTION 10: The Property

1. County or counties in which the proposed project will be located ..... Jefferson County

2. Central Appraisal District (CAD) that will be responsible for appraising the property ..... Jefferson CAD

3. Will this CAD be acting on behalf of another CAD to appraise this property? .....  Yes  No

4. List all taxing entities that have jurisdiction for the property, the portion of project within each entity and tax rates for each entity:

M&O (ISD): <u>Beaumont ISD; 100%; \$0.9089</u> (Name, tax rate and percent of project)	I&S (ISD): _____	Beaumont ISD; 100%; 0.25261 (Name, tax rate and percent of project)
County: <u>Jefferson County; 100%; \$0.363184</u> (Name, tax rate and percent of project)	City: _____	N/A (Name, tax rate and percent of project)
Hospital District: <u>N/A</u> (Name, tax rate and percent of project)	Water District: _____	N/A (Name, tax rate and percent of project)
Other (describe): <u>Port of Beaumont; 100%; \$0.1090</u> (Name, tax rate and percent of project)	Other (describe): _____	Sabine Neches Nav; 100%; \$0.092067 (Name, tax rate and percent of project)

## Schedule A1: Total Investment for Economic Impact (through the Qualifying Time Period)

Date 9/9/2025  
 Applicant Name LINDE INC.  
 ISD Name BEAUMONT ISD

2083 - Beaumont ISD - Linde Inc. - Amendment #2 after Agreement  
 September 29, 2025

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 Revised October 2020

PROPERTY INVESTMENT AMOUNTS								
(Estimated Investment in each year. Do not put cumulative totals.)								
				Column A	Column B	Column C	Column D	Column E
Year	School Year (YYYY-YYYY)	Tax Year (Fill in actual tax year below) YYYY		New investment (original cost) in <b>tangible personal property</b> placed in service during this year that will become Qualified Property	New investment made during this year in <b>buildings or permanent nonremovable components of buildings</b> that will become Qualified Property	Other new investment made during this year that will <u>not</u> become Qualified Property [SEE NOTE]	Other new investment made during this year that may become Qualified Property [SEE NOTE]	Total Investment (Sum of Columns A+B+C+D)
Investment made before filing complete application with district	- Year preceding the first complete tax year of the qualifying time period (assuming no deferrals of qualifying time period)			Not eligible to become Qualified Property		[The only other investment made before filing complete application with district that may become Qualified Property is land.]		
Investment made after filing complete application with district, but before final board approval of application				0	0	0	0	0
Investment made after final board approval of application and before Jan. 1 of first complete tax year of qualifying time period	Pre	2023		255,000,000	0	0	0	255,000,000
				145,000,000	0	0	0	145,000,000
	QTP1	2024-2025	2024	130,000,000	0	0	0	130,000,000
Total Investment through Qualifying Time Period [ENTER this row in Schedule A2]				530,000,000	0	0	0	530,000,000
Total Qualified Investment (sum of green cells)				275,000,000	Enter amounts from TOTAL row above in Schedule A2			

For All Columns: List amount invested each year, not cumulative totals.

Column A: This represents the total dollar amount of planned investment in tangible personal property. Only include estimates of investment for "replacement" property if the property is specifically described in the application.

Only tangible personal property that is specifically described in the application can become qualified property.

Column B: The total dollar amount of planned investment each year in buildings or nonremovable component of buildings.

Column C: Dollar value of other investment that may affect economic impact and total value. Examples of other investment that will not become qualified property include investment meeting the definition of 313.021(1) but not creating a new improvement as defined by TAC 9.1051. This is proposed property that functionally replaces existing property; is used to maintain, refurbish, renovate, modify or upgrade existing property; or is affixed to existing property—described in SECTION 13, question #5 of the application.

Column D: Dollar value of other investment that may affect economic impact and total value. Examples of other investment that may result in qualified property are land or professional services.

Total Investment: Add together each cell in a column and enter the sum in the blue total investment row. Enter the data from this row into the first row in Schedule A2.

Qualified Investment: For the green qualified investment cell, enter the sum of all the green-shaded cells.

## Schedule A2: Total Investment for Economic Impact (including Qualified Property and other investments)

Date 9/9/2025  
 Applicant Name LINDE INC.  
 ISD Name BEAUMONT ISD

2083 - Beaumont ISD - Linde Inc. - Amendment #2 after Agreement  
 September 29, 2025

Form 50-296A  
 Revised October 2020

PROPERTY INVESTMENT AMOUNTS								
(Estimated Investment in each year. Do not put cumulative totals.)								
				Column A	Column B	Column C	Column D	Column E
Year	School Year (YYYY-YYYY)	Tax Year (Fill in actual tax year below) YYYY		New investment (original cost) in <b>tangible personal property</b> placed in service during this year that will become Qualified Property	New investment made during this year in <b>buildings or permanent nonremovable components of buildings</b> that will become Qualified Property	Other investment made during this year that will not become Qualified Property (SEE NOTE)	Other investment made during this year that will become Qualified Property (SEE NOTE)	Total Investment (A+B+C+D)
Total Investment from Schedule A1*	--	TOTALS FROM SCHEDULE A1		530,000,000	0	0	0	530,000,000
Each year prior to start of value limitation period** <i>Insert as many rows as necessary</i>	Pre	2023-2024	2023	Enter amounts from TOTAL row in Schedule A1 in the row below				
	1	2024-2025	2024					
	2	2025-2026	2025					
	Stub	2026-2027	2026	490,000,000				490,000,000
Value limitation period***	1	2027-2028	2027					
	2	2028-2029	2028					
	3	2029-2030	2029					
	4	2030-2031	2030					
	5	2031-2032	2031					
	6	2032-2033	2032					
	7	2033-2034	2033					
	8	2034-2035	2034					
	9	2035-2036	2035					
	10	2036-2037	2036					
Total Investment made through limitation				1,020,000,000	0	0	0	1,020,000,000
Continue to maintain viable presence	11	2037-2038	2037					
	12	2038-2039	2038					
	13	2039-2040	2039					
	14	2040-2041	2040					
	15	2041-2042	2041					
Additional years for 25 year economic impact as required by 313.026(c)(1)	16	2042-2043	2042					
	17	2043-2044	2043					
	18	2044-2045	2044					
	19	2045-2046	2045					
	20	2046-2047	2046					
	21	2047-2048	2047					
	22	2048-2049	2048					
	23	2049-2050	2049					
	24	2050-2051	2050					
	25	2051-2052	2051					

\* All investments made through the qualifying time period are captured and totaled on Schedule A1 [blue box] and incorporated into this schedule in the **first row**.

\*\* Only investment made during deferrals of the start of the limitation (after the end of qualifying time period but before the start of the Value Limitation Period) should be included in the "year prior to start of value limitation period" row(s). If the limitation starts at the end of the qualifying time period or the qualifying time period overlaps the limitation, no investment should be included on this line.

\*\*\* If your qualifying time period will overlap your value limitation period, do not also include investment made during the qualifying time period in years 1 and/or 2 of the value limitation period, depending on the overlap. Only include investments/years that were **not** captured on Schedule A1.

For All Columns: List amount invested each year, not cumulative totals. Only include investments in the remaining rows of Schedule A2 that were not captured on Schedule A1.

Column A: This represents the total dollar amount of planned investment in tangible personal property. Only include estimates of investment for "replacement" property if the property is specifically described in the application.

Only tangible personal property that is specifically described in the application can become qualified property.

Column B: The total dollar amount of planned investment each year in buildings or nonremovable component of buildings.

Column C: Dollar value of other investment that may affect economic impact and total value. Examples of other investment that will not become qualified property include investment meeting the definition of 313.021(1) but not creating a new improvement as defined by TAC 9.1051. This is proposed property that functionally replaces existing property; is used to maintain, refurbish, renovate, modify or upgrade existing property; or is affixed to existing property—described in SECTION 13, question #5 of the application.

Column D: Dollar value of other investment that may affect economic impact and total value. Examples of other investment that may result in qualified property are land or professional services.

## Schedule B: Estimated Market And Taxable Value (of Qualified Property Only)

Date  
Applicant Name  
ISD Name

9/9/2025  
LINDE INC.  
BEAUMONT ISD

2083 - Beaumont ISD - Linde Inc. - Amendment #2 after Agreement  
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	Year	School Year (YYYY-YYYY)	Tax Year (Fill in actual tax year) YYYY	Qualified Property			Estimated Taxable Value		
				Estimated Market Value of Land	Estimated Total Market Value of new buildings or other new improvements	Estimated Total Market Value of tangible personal property in the new buildings or "in or on the new improvements"	Market Value less any exemptions (such as pollution control) and before limitation	Final taxable value for I&S after all reductions	Final taxable value for M&O after all reductions
Each year prior to start of Value Limitation Period <i>Insert as many rows as necessary</i>	QTP 1	2024-2025	2024	0	0	127,500,000	127,500,000	127,500,000	127,500,000
	QTP 2	2025-2026	2025			200,000,000	200,000,000	200,000,000	200,000,000
	Stub	2026-2027	2026	0	0	265,000,000	265,000,000	265,000,000	265,000,000
Value Limitation Period	1	2027-2028	2027	0	0	1,009,800,000	959,310,000	959,310,000	30,000,000
	2	2028-2029	2028	0	0	939,114,000	892,158,300	892,158,300	30,000,000
	3	2029-2030	2029	0	0	873,376,020	829,707,219	829,707,219	30,000,000
	4	2030-2031	2030	0	0	812,239,699	771,627,714	771,627,714	30,000,000
	5	2031-2032	2031	0	0	755,382,920	717,613,774	717,613,774	30,000,000
	6	2032-2033	2032	0	0	702,506,115	667,380,810	667,380,810	30,000,000
	7	2033-2034	2033	0	0	653,330,687	620,664,153	620,664,153	30,000,000
	8	2034-2035	2034	0	0	607,597,539	577,217,662	577,217,662	30,000,000
	9	2035-2036	2035	0	0	565,065,711	536,812,426	536,812,426	30,000,000
	10	2036-2037	2036	0	0	525,511,112	499,235,556	499,235,556	30,000,000
Continue to maintain viable presence	11	2037-2038	2037	0	0	488,725,334	464,289,067	464,289,067	464,289,067
	12	2038-2039	2038	0	0	454,514,560	431,788,832	431,788,832	431,788,832
	13	2039-2040	2039	0	0	422,698,541	401,563,614	401,563,614	401,563,614
	14	2040-2041	2040	0	0	393,109,643	373,454,161	373,454,161	373,454,161
	15	2041-2042	2041	0	0	365,591,968	347,312,370	347,312,370	347,312,370
Additional years for 25 year economic impact as required by 313.026(c)(1)	16	2042-2043	2042	0	0	340,000,530	323,000,504	323,000,504	323,000,504
	17	2043-2044	2043	0	0	316,200,493	300,390,469	300,390,469	300,390,469
	18	2044-2045	2044	0	0	294,066,459	279,363,136	279,363,136	279,363,136
	19	2045-2046	2045	0	0	273,481,807	259,807,716	259,807,716	259,807,716
	20	2046-2047	2046	0	0	254,338,080	241,621,176	241,621,176	241,621,176
	21	2047-2048	2047	0	0	236,534,415	224,707,694	224,707,694	224,707,694
	22	2048-2049	2048	0	0	219,977,006	208,978,155	208,978,155	208,978,155
	23	2049-2050	2049	0	0	204,578,615	194,349,684	194,349,684	194,349,684
	24	2050-2051	2050	0	0	190,258,112	180,745,207	180,745,207	180,745,207
	25	2051-2052	2051	0	0	176,940,044	168,093,042	168,093,042	168,093,042

Notes: Market value in future years is good faith estimate of future taxable value for the purposes of property taxation.

Only include market value for eligible property on this schedule.

### Schedule C: Employment Information

**Date** 9/9/2025  
**Applicant Name** LINDE INC.  
**ISD Name** BEAUMONT ISD

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				Construction		Non-Qualifying Jobs	Qualifying Jobs	
				Column A	Column B	Column C	Column D	Column E
<b>Each year prior to start of Value Limitation Period</b> <i>Insert as many rows as necessary</i>	Year	<b>School Year</b> (YYYY-YYYY)	<b>Tax Year</b> (Actual tax year) YYYY	Number of Construction FTE's	<b>Average</b> 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
	Pre	2023-2024	2023	600 FTE	52,500	0	0	0
	QTP 1	2024-2025	2024	600 FTE	52,500	0	0	0
	QTP 2	2025-2026	2025	600 FTE	52,500	0	0	0
<b>Value Limitation Period</b> <i>The qualifying time period could overlap the value limitation period.</i>	Stub	2026-2027	2026	600 FTE	52,500	0	0	0
	1	2027-2028	2027	N/A	N/A	0	10	50,407
	2	2028-2029	2028	N/A	N/A	0	10	50,407
	3	2029-2030	2029	N/A	N/A	0	10	50,407
	4	2030-2031	2030	N/A	N/A	0	10	50,407
	5	2031-2032	2031	N/A	N/A	0	10	50,407
	6	2032-2033	2032	N/A	N/A	0	10	50,407
	7	2033-2034	2033	N/A	N/A	0	10	50,407
	8	2034-2035	2034	N/A	N/A	0	10	50,407
	9	2035-2036	2035	N/A	N/A	0	10	50,407
<b>Years Following Value Limitation Period</b>	10	2036-2037	2036	N/A	N/A	0	10	50,407
	11 through 25	2037-2052	2037-2051	N/A	N/A	0	10	50,407

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. Shannon Allen

Print Name (Authorized School District Representative)

Superintendent

Title

**sign here** 

Signature (Authorized School District Representative)

9/26/2025

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** Amer Akhras

Print Name (Authorized Company Representative (Applicant))

Vice President, South Region

Title

**sign here** 

Signature (Authorized Company Representative (Applicant))

9/24/2025

Date



GIVEN under my hand and seal of office this, the

24 day of September, 2025  


Notary Public in and for the State of Texas

My Commission expires:



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.

(Notary Seal)