



TEXAS COMPTROLLER OF PUBLIC ACCOUNTS

December 4, 2025

AMENDED COMPLETENESS,
CERTIFICATE & AGREEMENT
APPROVAL

Dr. Greg Poole
Superintendent
Barbers Hill Independent School District
9600 Eagle Drive
Mont Belvieu, Texas 77523

Re: Amendment Agreement for Limitation on Appraised Value of Property for School District Maintenance and Operations taxes by and between Barbers Hill Independent School District and Targa Downstream, LLC, Application 1228

Dear Dr. Poole:

This application (Application 1228) was originally submitted on November 10, 2017, to the Barbers Hill Independent School District (school district) by Targa Downstream, LLC (applicant) for a limitation on appraised value under the provisions of Tax Code Chapter 313.¹ On February 2, 2018, the Comptroller issued written notice that the applicant submitted a completed application; and later issued a certificate for a limitation on appraised value on March 16, 2018. The applicant and school district executed an agreement for a limitation on appraised value (agreement) on June 25, 2018.

On November 21, 2025, the Comptroller received an amendment to the agreement to reduce the number of qualified jobs from 12 to 10 and, subsequently, determined that it includes the information necessary to be determined as complete. This presents the Comptroller's review of that amendment per Section 10.2 of the agreement 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 B; 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)

The information provided by the applicant related to eligibility has not changed and therefore, 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 B.

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

Certificate decision required by 313.025(d)

Determination required by 313.026(c)(1)

Based on the amended information provided by the applicant, 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 previously 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.

Based on these determinations, the Comptroller approves changes to the certificate for a limitation on appraised value for the amendment.

The Comptroller's review of the amended application and amended agreement assumes the accuracy and completeness of the statements in the amendment. If the amendment is approved by the school district, the applicant shall perform according to the provisions of the Texas Economic Development Act Agreement (Form 50-826) and all amendments, 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 approval is no longer valid if the information presented in the amendment changes, or the amended limitation agreement does not conform to the amended application. Additionally, this approval is contingent on the school district approving and executing the amendment to the agreement by **December 31, 2025**.

This office has also been provided with the Amended Agreement for Limitation on Appraised Value. As requested, the amendment to the Agreement has been reviewed pursuant to 34 TAC 9.1055(e)(1). Based on our review, this office concludes that the agreement complies with the provisions of Tax Code, Chapter 313 and 34 TAC Chapter 9, Subchapter F.

Should you have any questions, please contact Desiree Caufield, Manager, Data Analysis & Transparency, by email at desiree.caufield@cpa.texas.gov or by phone toll-free at 1-800-531-5441, ext. 6-8597, or at 512-936-8597.

Sincerely,

DocuSigned by:



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Will Counihan

Director

Data Analysis & Transparency

cc: Sara Leon, Leon Alcala, PLLC
Aric Mann, Targa Resources LLC
Dorothy Pearson, Targa Resources LLC
Mike Fry, KE Andrews

Amended Attachment A – Economic Impact Analysis

The following tables summarize the Comptroller’s economic impact analysis of Targa Downstream, LLC (project) applying to Barbers Hill 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 Targa Downstream, LLC.

	Original	Amendment No. 1
Applicant	Targa Downstream, LLC	Targa Downstream, LLC
Tax Code, 313.024 Eligibility Category	Manufacturing	Manufacturing
School District	Barbers Hill ISD	Barbers Hill ISD
2016-2017 Average Daily Attendance	5,007	5,007
County	Chambers	Chambers
Proposed Total Investment in District	\$231,000,000	\$231,000,000
Proposed Qualified Investment	\$231,000,000	\$231,000,000
Limitation Amount	\$80,000,000	\$80,000,000
Qualifying Time Period (Full Years)	2019-2020	2019-2020
Number of new qualifying jobs committed to by applicant	12*	10*
Number of new non-qualifying jobs estimated by applicant	0	0
Average weekly wage of qualifying jobs committed to by applicant	\$1,210.97	\$1,210.97
Minimum weekly wage required for each qualifying job by Tax Code, 313.021(5)(B)	\$1,210.97	\$1,210.97
Minimum annual wage committed to by applicant for qualified jobs	\$62,970.60	\$62,970.60
Minimum weekly wage required for non-qualifying jobs	\$1,176.75	\$1,176.75
Minimum annual wage required for non-qualifying jobs	\$61,191.00	\$61,191.00
Investment per Qualifying Job	\$19,250,000	\$23,100,000
Estimated M&O levy without any limit (15 years)	\$31,296,500	\$31,296,500
Estimated M&O levy with Limitation (15 years)	\$18,073,000	\$18,073,000
Estimated gross M&O tax benefit (15 years)	\$13,223,500	\$13,223,500

* 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 Targa Downstream, LLC (modeled).

	Employment			Personal Income		
Year	Direct	Indirect + Induced	Total	Direct	Indirect + Induced	Total
2018	503	734	1237	\$31,674,212	\$58,755,788	\$90,430,000
2019	512	809	1321	\$32,240,947	\$72,309,053	\$104,550,000
2020	12	138	150	\$755,647	\$20,584,353	\$21,340,000
2021	12	69	81	\$755,647	\$13,454,353	\$14,210,000
2022	12	12	24	\$755,647	\$7,734,353	\$8,490,000
2023	12	(13)	-1	\$755,647	\$4,404,353	\$5,160,000
2024	12	(17)	-5	\$755,647	\$2,854,353	\$3,610,000
2025	10	(16)	-6	\$629,706	\$2,080,294	\$2,710,000
2026	10	(4)	6	\$629,706	\$2,570,294	\$3,200,000
2027	10	10	20	\$629,706	\$3,490,294	\$4,120,000
2028	10	24	34	\$629,706	\$4,630,294	\$5,260,000
2029	10	35	45	\$629,706	\$5,810,294	\$6,440,000
2030	10	41	51	\$629,706	\$6,640,294	\$7,270,000
2031	10	47	57	\$629,706	\$7,480,294	\$8,110,000
2032	10	50	60	\$629,706	\$8,180,294	\$8,810,000
2033	10	52	62	\$629,706	\$8,740,294	\$9,370,000
2034	10	52	62	\$629,706	\$9,130,294	\$9,760,000

Source: CPA REMI, Targa Downstream, 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		Barbers Hill ISD I&S Tax Levy	Barbers Hill ISD M&O Tax Levy	Barbers Hill M&O and I&S Tax Levies	Chambers County Tax Levy	Mont Belvieu Tax Levy	Estimated Total Property Taxes
			Tax Rate*	0.2698	1.0600		0.4968	0.4367	
2019	\$50,000,000	\$50,000,000		\$134,900	\$530,000	\$664,900	\$248,395	\$218,355	\$1,131,650
2020	\$225,000,000	\$225,000,000		\$607,050	\$2,385,000	\$2,992,050	\$1,117,778	\$982,598	\$5,092,425
2021	\$220,500,000	\$220,500,000		\$594,909	\$2,337,300	\$2,932,209	\$1,095,422	\$962,946	\$4,990,577
2022	\$216,000,000	\$216,000,000		\$582,768	\$2,289,600	\$2,872,368	\$1,073,066	\$943,294	\$4,888,728
2023	\$211,500,000	\$211,500,000		\$570,627	\$2,241,900	\$2,812,527	\$1,050,711	\$923,642	\$4,786,880
2024	\$207,000,000	\$207,000,000		\$558,486	\$2,194,200	\$2,752,686	\$1,028,355	\$903,990	\$4,685,031
2025	\$202,500,000	\$202,500,000		\$546,345	\$2,146,500	\$2,692,845	\$1,006,000	\$884,338	\$4,583,183
2026	\$198,000,000	\$198,000,000		\$534,204	\$2,098,800	\$2,633,004	\$983,644	\$864,686	\$4,481,334
2027	\$193,500,000	\$193,500,000		\$522,063	\$2,051,100	\$2,573,163	\$961,289	\$845,034	\$4,379,486
2028	\$189,000,000	\$189,000,000		\$509,922	\$2,003,400	\$2,513,322	\$938,933	\$825,382	\$4,277,637
2029	\$184,500,000	\$184,500,000		\$497,781	\$1,955,700	\$2,453,481	\$916,578	\$805,730	\$4,175,789
2030	\$180,000,000	\$180,000,000		\$485,640	\$1,908,000	\$2,393,640	\$894,222	\$786,078	\$4,073,940
2031	\$175,500,000	\$175,500,000		\$473,499	\$1,860,300	\$2,333,799	\$871,866	\$766,426	\$3,972,092
2032	\$171,000,000	\$171,000,000		\$461,358	\$1,812,600	\$2,273,958	\$849,511	\$746,774	\$3,870,243
2033	\$166,500,000	\$166,500,000		\$449,217	\$1,764,900	\$2,214,117	\$827,155	\$727,122	\$3,768,395
2034	\$162,000,000	\$162,000,000		\$437,076	\$1,717,200	\$2,154,276	\$804,800	\$707,470	\$3,666,546
			Total	\$7,965,845	\$31,296,500	\$39,262,345	\$14,667,725	\$12,893,863	\$66,823,933

Source: CPA, Targe Downstream, LLC

*Tax Rate per \$100 Valuation

Table 4 examines the estimated direct impact on ad valorem taxes to the school district and Chambers 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		Barbers Hill ISD I&S Tax Levy	Barbers Hill ISD M&O Tax Levy	Barbers Hill M&O and I&S Tax Levies	Chambers County Tax Levy	Mont Belvieu Tax Levy	Estimated Total Property Taxes
			Tax Rate*	0.2698	1.0600		0.4968	0.4367	
2019	\$50,000,000	\$50,000,000		\$134,900	\$530,000	\$664,900	\$248,395	\$218,355	\$1,131,650
2020	\$225,000,000	\$80,000,000		\$607,050	\$848,000	\$1,455,050	\$625,955	\$530,603	\$2,611,608
2021	\$220,500,000	\$80,000,000		\$594,909	\$848,000	\$1,442,909	\$613,436	\$519,991	\$2,576,336
2022	\$216,000,000	\$80,000,000		\$582,768	\$848,000	\$1,430,768	\$600,917	\$509,379	\$2,541,064
2023	\$211,500,000	\$80,000,000		\$570,627	\$848,000	\$1,418,627	\$588,398	\$498,766	\$2,505,792
2024	\$207,000,000	\$80,000,000		\$558,486	\$848,000	\$1,406,486	\$575,879	\$488,154	\$2,470,519
2025	\$202,500,000	\$80,000,000		\$546,345	\$848,000	\$1,394,345	\$563,360	\$477,542	\$2,435,247
2026	\$198,000,000	\$80,000,000		\$534,204	\$848,000	\$1,382,204	\$550,841	\$466,930	\$2,399,975
2027	\$193,500,000	\$80,000,000		\$522,063	\$848,000	\$1,370,063	\$538,322	\$456,318	\$2,364,703
2028	\$189,000,000	\$80,000,000		\$509,922	\$848,000	\$1,357,922	\$525,803	\$445,706	\$2,329,431
2029	\$184,500,000	\$80,000,000		\$497,781	\$848,000	\$1,345,781	\$513,283	\$435,094	\$2,294,159
2030	\$180,000,000	\$180,000,000		\$485,640	\$1,908,000	\$2,393,640	\$894,222	\$786,078	\$4,073,940
2031	\$175,500,000	\$175,500,000		\$473,499	\$1,860,300	\$2,333,799	\$871,866	\$766,426	\$3,972,092
2032	\$171,000,000	\$171,000,000		\$461,358	\$1,812,600	\$2,273,958	\$849,511	\$746,774	\$3,870,243
2033	\$166,500,000	\$166,500,000		\$449,217	\$1,764,900	\$2,214,117	\$827,155	\$727,122	\$3,768,395
2034	\$162,000,000	\$162,000,000		\$437,076	\$1,717,200	\$2,154,276	\$804,800	\$707,470	\$3,666,546
			Total	\$7,965,845	\$18,073,000	\$26,038,845	\$10,192,144	\$8,780,710	\$45,011,698
			Diff	\$0	\$13,223,500	\$13,223,500	\$4,475,581	\$4,113,153	\$21,812,234
Assumes School Value Limitation and Tax Abatements with the County.									

Source: CPA, Targa Downstream, 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 Targa Downstream, 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	2017	\$0	\$0	\$0	\$0
	2018	\$0	\$0	\$0	\$0
	2019	\$530,000	\$530,000	\$0	\$0
Limitation Period (10 Years)	2020	\$848,000	\$1,378,000	\$1,537,000	\$1,537,000
	2021	\$848,000	\$2,226,000	\$1,489,300	\$3,026,300
	2022	\$848,000	\$3,074,000	\$1,441,600	\$4,467,900
	2023	\$848,000	\$3,922,000	\$1,393,900	\$5,861,800
	2024	\$848,000	\$4,770,000	\$1,346,200	\$7,208,000
	2025	\$848,000	\$5,618,000	\$1,298,500	\$8,506,500
	2026	\$848,000	\$6,466,000	\$1,250,800	\$9,757,300
	2027	\$848,000	\$7,314,000	\$1,203,100	\$10,960,400
	2028	\$848,000	\$8,162,000	\$1,155,400	\$12,115,800
	2029	\$848,000	\$9,010,000	\$1,107,700	\$13,223,500
Maintain Viable Presence (5 Years)	2030	\$1,908,000	\$10,918,000	\$0	\$13,223,500
	2031	\$1,860,300	\$12,778,300	\$0	\$13,223,500
	2032	\$1,812,600	\$14,590,900	\$0	\$13,223,500
	2033	\$1,764,900	\$16,355,800	\$0	\$13,223,500
	2034	\$1,717,200	\$18,073,000	\$0	\$13,223,500
Additional Years as Required by 313.026(c)(1) (10 Years)	2035	\$1,669,500	\$19,742,500	\$0	\$13,223,500
	2036	\$1,621,800	\$21,364,300	\$0	\$13,223,500
	2037	\$1,574,100	\$22,938,400	\$0	\$13,223,500
	2038	\$1,526,400	\$24,464,800	\$0	\$13,223,500
	2039	\$1,478,700	\$25,943,500	\$0	\$13,223,500
	2040	\$1,431,000	\$27,374,500	\$0	\$13,223,500
	2041	\$1,383,300	\$28,757,800	\$0	\$13,223,500
	2042	\$1,335,600	\$30,093,400	\$0	\$13,223,500
	2043	\$1,287,900	\$31,381,300	\$0	\$13,223,500
	2044	\$1,240,200	\$32,621,500	\$0	\$13,223,500
		\$32,621,500	is greater than	\$13,223,500	
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, Targa Downstream, LLC

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.