



## TEXAS COMPTROLLER OF PUBLIC ACCOUNTS

November 3, 2025

AMENDED COMPLETENESS,  
CERTIFICATE & AGREEMENT  
APPROVAL

Scotty Carman  
Superintendent  
Wink-Loving Independent School District  
P.O. Box 637  
Wink, Texas 79789

Re: Amendment Agreement for Limitation on Appraised Value of Property for School District Maintenance and Operations taxes by and between Wink-Loving Independent School District and ETC Texas Pipeline, LTD, Application 1710

Dear Superintendent Carman:

This application (Application 1710) was originally submitted on February 23, 2022, to the Wink-Loving Independent School District (school district) by ETC Texas Pipeline, LTD (applicant) for a limitation on appraised value under the provisions of Tax Code Chapter 313.<sup>1</sup> On March 11, 2022, the Comptroller issued written notice that the applicant submitted a completed application; and later issued a certificate for a limitation on appraised value on May 16, 2022. The applicant and school district executed an agreement for a limitation on appraised value (agreement) on October 20, 2022.

On October 15, 2025, the Comptroller received an amendment to the agreement to reduce the number of qualifying jobs from 10 to 5 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 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)**

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 C.

<sup>1</sup> 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](mailto: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  
Rebecca Otterson, Energy Transfer Partners, LP  
Mike Fry, KE Andrews

## Amended Attachment A – Economic Impact Analysis

The following tables summarize the Comptroller's economic impact analysis of ETC Texas Pipeline, LTD (project) applying to Wink-Loving 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 ETC Texas Pipeline, LTD.

	<b>Original</b>	<b>Amendment No. 1</b>
Applicant	ETC Texas Pipeline, LTD	ETC Texas Pipeline, LTD
Tax Code, 313.024 Eligibility Category	Manufacturing	Manufacturing
School District	Wink-Loving ISD	Wink-Loving ISD
2020-2021 Average Daily Attendance	376	376
County	Winkler	Winkler
Proposed Total Investment in District	\$110,000,000	\$110,000,000
Proposed Qualified Investment	\$110,000,000	\$110,000,000
Limitation Amount	\$30,000,000	\$30,000,000
Qualifying Time Period (Full Years)	2023-2024	2023-2024
Number of new qualifying jobs committed to by applicant	10	5*
Number of new non-qualifying jobs estimated by applicant	0	0
Average weekly wage of qualifying jobs committed to by applicant	\$993	\$993
Minimum weekly wage required for each qualifying job by Tax Code, 313.021(5)(B)	\$993	\$993
Minimum annual wage committed to by applicant for qualified jobs	\$51,640	\$51,640
Minimum weekly wage required for non-qualifying jobs	\$1,355.75	\$1,355.75
Minimum annual wage required for non-qualifying jobs	\$70,499	\$70,499
Investment per Qualifying Job	\$11,000,000	\$11,000,000
Estimated M&O levy without any limit (15 years)	\$10,804,860	\$8,306,496
Estimated M&O levy with Limitation (15 years)	\$5,329,670	\$4,097,312
Estimated gross M&O tax benefit (15 years)	\$5,475,190	\$4,209,184

\*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 ETC Texas Pipeline, LTD (modeled).

Year	Employment			Personal Income		
	Direct	Indirect + Induced	Total	Direct	Indirect + Induced	Total
2022	100	110	210	\$4,000,000	\$11,270,000	\$15,270,000
2023	10	43	53	\$516,395	\$4,783,605	\$5,300,000
2024	10	43	53	\$516,395	\$4,873,605	\$5,390,000
2025	5	23	28	\$258,198	\$3,231,803	\$3,490,000
2026	5	20	25	\$258,198	\$2,881,803	\$3,140,000
2027	5	18	23	\$258,198	\$2,661,803	\$2,920,000
2028	5	17	22	\$258,198	\$2,591,803	\$2,850,000
2029	5	17	22	\$258,198	\$2,641,803	\$2,900,000
2030	5	18	23	\$258,198	\$2,761,803	\$3,020,000
2031	5	18	23	\$258,198	\$2,921,803	\$3,180,000
2032	5	19	24	\$258,198	\$3,121,803	\$3,380,000
2033	5	19	24	\$258,198	\$3,261,803	\$3,520,000
2034	5	20	25	\$258,198	\$3,461,803	\$3,720,000
2035	5	21	26	\$258,198	\$3,671,803	\$3,930,000
2036	5	21	26	\$258,198	\$3,881,803	\$4,140,000
2037	5	21	26	\$258,198	\$4,091,803	\$4,350,000

Source: CPA REMI, ETC Texas Pipeline, LTD

**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		Wink-Loving ISD I&S Tax Levy	Wink-Loving ISD M&O Tax Levy	Wink-Loving ISD M&O and I&S Tax Levies	Winkler County Tax Levy	Winkler County Memorial Hospital District Tax Levy	FC & LR Tax Levy	Estimated Total Property Taxes
			Tax Rate*	0.1100	0.6992		0.4007	0.2183	0.0485	
2023	\$110,000,000	\$110,000,000		\$121,000	\$769,120	\$890,120	\$440,770	\$240,118	\$53,350	\$1,624,358
2024	\$105,600,000	\$105,600,000		\$116,160	\$738,355	\$854,515	\$423,139	\$230,513	\$51,216	\$1,559,384
2025	\$101,200,000	\$101,200,000		\$111,320	\$707,590	\$818,910	\$405,508	\$220,908	\$49,082	\$1,494,409
2026	\$96,800,000	\$96,800,000		\$106,480	\$676,826	\$783,306	\$387,878	\$211,304	\$46,948	\$1,429,435
2027	\$92,400,000	\$92,400,000		\$101,640	\$646,061	\$747,701	\$370,247	\$201,699	\$44,814	\$1,364,461
2028	\$88,000,000	\$88,000,000		\$96,800	\$615,296	\$712,096	\$352,616	\$192,094	\$42,680	\$1,299,486
2029	\$83,600,000	\$83,600,000		\$91,960	\$584,531	\$676,491	\$334,985	\$182,490	\$40,546	\$1,234,512
2030	\$79,200,000	\$79,200,000		\$87,120	\$553,766	\$640,886	\$317,354	\$172,885	\$38,412	\$1,169,538
2031	\$74,800,000	\$74,800,000		\$82,280	\$523,002	\$605,282	\$299,724	\$163,280	\$36,278	\$1,104,563
2032	\$70,400,000	\$70,400,000		\$77,440	\$492,237	\$569,677	\$282,093	\$153,675	\$34,144	\$1,039,589
2033	\$66,000,000	\$66,000,000		\$72,600	\$461,472	\$534,072	\$264,462	\$144,071	\$32,010	\$974,615
2034	\$61,600,000	\$61,600,000		\$67,760	\$430,707	\$498,467	\$246,831	\$134,466	\$29,876	\$909,640
2035	\$57,200,000	\$57,200,000		\$62,920	\$399,942	\$462,862	\$229,200	\$124,861	\$27,742	\$844,666
2036	\$52,800,000	\$52,800,000		\$58,080	\$369,178	\$427,258	\$211,570	\$115,257	\$25,608	\$779,692
2037	\$48,400,000	\$48,400,000		\$53,240	\$338,413	\$391,653	\$193,939	\$105,652	\$23,474	\$714,717
			Total	\$1,306,800	\$8,306,496	\$9,613,296	\$4,760,316	\$2,593,273	\$576,180	\$17,543,065

Source: CPA, ETC Texas Pipeline, LTD

\*Tax Rate per \$100 Valuation

**Table 4** examines the estimated direct impact on ad valorem taxes to the school district and Winkler 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.

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		Wink-Loving ISD I&S Tax Levy	Wink-Loving ISD M&O and I&S Tax Levies	Winkler County Tax Levy	Winkler County Memorial Hospital District Tax Levy	FC & LR Tax Levy	Estimated Total Property Taxes	
			Tax Rate*	0.1100	0.6992		0.4007	0.2183	0.0485	
2023	\$110,000,000	\$30,000,000		\$121,000	\$209,760	\$330,760	\$440,770	\$240,118	\$53,350	\$1,064,998
2024	\$105,600,000	\$30,000,000		\$116,160	\$209,760	\$325,920	\$423,139	\$230,513	\$51,216	\$1,030,788
2025	\$101,200,000	\$30,000,000		\$111,320	\$209,760	\$321,080	\$405,508	\$220,908	\$49,082	\$996,579
2026	\$96,800,000	\$30,000,000		\$106,480	\$209,760	\$316,240	\$387,878	\$211,304	\$46,948	\$962,369
2027	\$92,400,000	\$30,000,000		\$101,640	\$209,760	\$311,400	\$370,247	\$201,699	\$44,814	\$928,160
2028	\$88,000,000	\$30,000,000		\$96,800	\$209,760	\$306,560	\$352,616	\$192,094	\$42,680	\$893,950
2029	\$83,600,000	\$30,000,000		\$91,960	\$209,760	\$301,720	\$334,985	\$182,490	\$40,546	\$859,741
2030	\$79,200,000	\$30,000,000		\$87,120	\$209,760	\$296,880	\$317,354	\$172,885	\$38,412	\$825,531
2031	\$74,800,000	\$30,000,000		\$82,280	\$209,760	\$292,040	\$299,724	\$163,280	\$36,278	\$791,322
2032	\$70,400,000	\$30,000,000		\$77,440	\$209,760	\$287,200	\$282,093	\$153,675	\$34,144	\$757,112
2033	\$66,000,000	\$66,000,000		\$72,600	\$461,472	\$534,072	\$264,462	\$144,071	\$32,010	\$974,615
2034	\$61,600,000	\$61,600,000		\$67,760	\$430,707	\$498,467	\$246,831	\$134,466	\$29,876	\$909,640
2035	\$57,200,000	\$57,200,000		\$62,920	\$399,942	\$462,862	\$229,200	\$124,861	\$27,742	\$844,666
2036	\$52,800,000	\$52,800,000		\$58,080	\$369,178	\$427,258	\$211,570	\$115,257	\$25,608	\$779,692
2037	\$48,400,000	\$48,400,000		\$53,240	\$338,413	\$391,653	\$193,939	\$105,652	\$23,474	\$714,717
			Total	\$1,306,800	\$4,097,312	\$5,404,112	\$4,760,316	\$2,593,273	\$576,180	\$13,333,881
			Diff	\$0	\$4,209,184	\$4,209,184	\$0	\$0	\$0	\$4,209,184

Assumes School Value Limitation.

Source: CPA, ETC Texas Pipeline, LTD

\*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 25<sup>th</sup> Anniversary of Limitation Start

This represents the Comptroller's determination that ETC Texas Pipeline, LTD (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	2020	\$0	\$0	\$0	\$0
	2021	\$0	\$0	\$0	\$0
	2022	\$0	\$0	\$0	\$0
Limitation Period (10 Years)	2023	\$209,760	\$209,760	\$559,360	\$559,360
	2024	\$209,760	\$419,520	\$528,595	\$1,087,955
	2025	\$209,760	\$629,280	\$497,830	\$1,585,786
	2026	\$209,760	\$839,040	\$467,066	\$2,052,851
	2027	\$209,760	\$1,048,800	\$436,301	\$2,489,152
	2028	\$209,760	\$1,258,560	\$405,536	\$2,894,688
	2029	\$209,760	\$1,468,320	\$374,771	\$3,269,459
	2030	\$209,760	\$1,678,080	\$344,006	\$3,613,466
	2031	\$209,760	\$1,887,840	\$313,242	\$3,926,707
	2032	\$209,760	\$2,097,600	\$282,477	\$4,209,184
Maintain Viable Presence (5 Years)	2033	\$461,472	\$2,559,072	\$0	\$4,209,184
	2034	\$430,707	\$2,989,779	\$0	\$4,209,184
	2035	\$399,942	\$3,389,722	\$0	\$4,209,184
	2036	\$369,178	\$3,758,899	\$0	\$4,209,184
	2037	\$338,413	\$4,097,312	\$0	\$4,209,184
Additional Years as Required by 313.026(c)(1) (10 Years)	2038	\$307,648	\$4,404,960	\$0	\$4,209,184
	2039	\$276,883	\$4,681,843	\$0	\$4,209,184
	2040	\$246,118	\$4,927,962	\$0	\$4,209,184
	2041	\$215,354	\$5,143,315	\$0	\$4,209,184
	2042	\$184,589	\$5,327,904	\$0	\$4,209,184
	2043	\$153,824	\$5,481,728	\$0	\$4,209,184
	2044	\$123,059	\$5,604,787	\$0	\$4,209,184
	2045	\$92,294	\$5,697,082	\$0	\$4,209,184
	2046	\$61,530	\$5,758,611	\$0	\$4,209,184
	2047	\$30,765	\$5,789,376	\$0	\$4,209,184
		<b>\$5,789,376</b>	is greater than	<b>\$4,209,184</b>	
<b>Analysis Summary</b>					
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, ETC Texas Pipeline, LTD

**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.