



**AMENDED TAX ABATEMENT AGREEMENT BETWEEN JEFFERSON
COUNTY DRAINAGE DISTRICT 7 AND OCI CLEAN AMMONIA LLC (PHASE
1 AND PHASE 2) FOR PROPERTY LOCATED
IN THE OCI 2022 REINVESTMENT ZONE**

STATE OF TEXAS

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COUNTY OF JEFFERSON

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1. Jefferson County Drainage District 7 ("DD7") and OCI Clean Ammonia LLC ("Owner"), (together, the "Parties") entered into Tax Abatement Agreements ("Abatement Agreements") on September 6, 2022 (attached hereto as Exhibit "A") for Phases 1 and 2 with respect to the abatement of certain *ad valorem* property taxes on a new industrial facility (the "Project") to be constructed by OWNER, in the OCI 2022 REINVESTMENT ZONE which was originally adopted by Jefferson County on July 19, 2022 and later amended by Jefferson County on September 6, 2023.

2. Owner notified DD7 that it had sold the facility and assigned all interests in it to Woodside Energy Group Ltd. and that and now Woodside Energy Group Ltd. (hereinafter referred to as "Woodside") is requesting that DD7 approve the transfer and assignment of these Abatement Agreements to Woodside, pursuant to Chapter 312, Texas Tax Code who would assume the role of Owner, including all the assets, contractual rights, privileges and obligations conferred to OCI Clean Ammonia LLC.

3. Owner is requesting that DD7 approve the assignment of the Abatement Agreements to Woodside to be effective immediately upon the execution of this Amended Agreement. Woodside has agreed to assume all obligations of OCI Clean Ammonia LLC under the Abatement Agreements, and the real interests and obligations outlined in the Abatement Agreements.

4. Owner is requesting the owner's name be modified to reflect the change of the name of the entity from OCI Clean Ammonia LLC to Beaumont New Ammonia LLC. This name change was filed February 2025 and is a change of name only, the company details will remain as is, including addresses, Tax ID, EIN and other corporate registration numbers.

5. Owner is requesting that DD7 modify the Phase 1 Agreement to move the date of the tax abatement percentages agreed to for Phase 1 closer for anticipated completion during 2025, from tax year 2028 to 2026 while leaving in place the abatement schedule for Phase 2.

6. The Parties acknowledge that, in the course of the sale of this facility, there has been no pause in construction and that all terms and conditions of the Abatement Agreements have been fulfilled pursuant to the original Abatement Agreements and Woodside is requesting that the benefits of the abatement of ad valorem taxes will enure to the benefit of Woodside.

Article 4: Term of Abatement

For the Phase 1 agreement, Article 4 is hereby amended to provide that:

Year 1 of the abatement Period for Phase 1 shall be tax year 2026, the revised abatement schedule is attached as Exhibit B.

7. Woodside will fulfill the obligation imposed upon OCI Clean Ammonia LLC to create and maintain new full-time jobs.
8. The Parties agree that OWNER will certify to DD7 the completion of the project and provide quarterly reports to ensure compliance with the original Agreement.
9. The Parties further acknowledge and agree that all other terms and conditions of the original Abatement Agreement shall remain in full force and effect unless amended by written agreement.

Signed this 21st day of October, 2025

DD7:


Allen D. Sims, General Manager

OWNER:


Lori Kendall, President

PHASE 1 AGREEMENT

Amended Abatement Schedule
Exhibit B

TAX ABATEMENT SCHEDULE

PHASE 1

	TAX YEAR	ABATEMENT PERCENTAGE
1	2026	100%
2	2027	100%
3	2028	100%
4	2029	100%
5	2030	100%
6	2031	100%
7	2032	100%
8	2033	100%
9	2034	100%
10	2035	100%