From: Damian Matthews
To: Rules Coordinator
Subject: Public Comment SB 1150
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Re: Proposed amendments to 16 TAC §§3.15 and 3.58 (SB 1150), published in the Texas Register October 23, 2026

I support the Commission's work to reduce the backlog of long-inactive wells. My comments focus on transparency. Clear public data will help sureties, lenders, lease buyers and landowners judge plugging risk before it becomes a state cost.

1. Publish the 15/25 well list in bulk. Please include a flag for 15/25 wells in the existing bulk data files, or provide a separate downloadable list updated monthly. It should show the API number, current operator and the date the well first qualified. A buyer evaluating a lease transfer should be able to see quickly which wells are already on the clock.

2. Publish extension decisions. For each 15/25 well, please make public whether a plugging extension was granted, on which ground (return-to-service history, financial hardship, compliance plan or individual performance bond), and the expiration date. Because some extensions do not transfer to a new operator, this information matters most at the time of a sale.

3. Publish compliance plan progress. For operators on a compliance plan, please publish the annual plugging or reactivation commitment and the operator's actual progress against it each year.

4. Make the bond calculation predictable. For the individual performance bond option, please publish the method used to calculate each well's plugging cost and make the calculated amount available per well. Sureties can underwrite these bonds more quickly and consistently when they can see the cost basis in advance.

5. Flag 15/25 wells on operator transfers. When a P-4 change moves 15/25 wells to a new operator, a public flag showing how much compliance time remains would help prevent idle wells from being shifted to operators without the resources to plug them.

Thank you for the opportunity to comment.

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