

**From:** [Sunset Advisory Commission](#)  
**To:** [Brittany Calame](#)  
**Subject:** FW: Public Input Form for Agencies Under Review (Public/After Publication)  
**Date:** Wednesday, August 15, 2018 12:14:08 PM

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-----Original Message-----

From: sunset@sunset.texas.gov <sunset@sunset.texas.gov> On Behalf Of Texas Sunset Commission  
Sent: Wednesday, August 15, 2018 12:13 PM  
To: Sunset Advisory Commission <Sunset@sunset.texas.gov>  
Subject: Public Input Form for Agencies Under Review (Public/After Publication)

Agency: TEXAS BOARD PROFESSIONAL GEOSCIENTISTS TBPG

First Name: Andrew

Last Name: Alff

Title: Geologist

Organization you are affiliated with: Texas Professional Geoscientist #6637

Email:

City: Pflugerville

State: Texas

Your Comments About the Staff Report, Including Recommendations Supported or Opposed:

I was surprised to see the recommendation to abolish the Texas Professional Geoscientist recommendation. The Texas Railroad Commission currently has a huge number of wells that are not producing that they are regulating. They are attempting to sort those that need to be plugged to keep from endangering our state from those that have future ability to be utilized in a commercial capacity benefitting and contributing to the well-being of our state. They do not have the time to sort through these wells and determine which is which. They depend on licensed Geologists and Engineers to do that for them and make recommendations as to the wells future utility. By only utilizing licensed Geologists and Engineers, the Texas Railroad Commission has a way to make sure the public is protected when those recommendations are made. By taking away the licensed Geologist designation you would put the public at risk by not having enough competent professionals to review and make those recommendations.

In addition, when hearings are made at the commission regarding geology matters, it is important to know that the person making statements is qualified to do so. By requiring them to be State Certified there is a level of certainty that the person has a background that allows them to make those statements.

I have written and certified many abeyance letters for companies so that they could later re-enter wells and bring them back into production which benefits the state. I have also had companies face the reality that plugging the well is necessary due to it having no future value thus taking a potential pollution problem from happening.

I have testified before the Texas Railroad Commission on behalf of an Operator regarding a fairly complex geology matter that resulted in a well to be produced that otherwise would not have been due to the uniqueness of the geology on that lease.

I recommend that Texas continue to license Geoscientists so that the public can continue to benefit from having oil and gas wells safely produced and plugged through careful screening done by them.

Any Alternative or New Recommendations on This Agency: If the Texas Professional Geoscientist designation is abolished, require geologists to be members of American Association Of Petroleum Geologists to write abeyance letters or to testify before the Texas Railroad Commission. This is not as desirable in that you then are placing the states need of certifying professionals in the hands of others.

My Comment Will Be Made Public: I agree