

From: [Sunset Advisory Commission](#)
To: [Brittany Calame](#)
Subject: FW: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Thursday, August 16, 2018 4:00:42 PM

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

From: sunset@sunset.texas.gov <sunset@sunset.texas.gov> On Behalf Of Texas Sunset Commission
Sent: Thursday, August 16, 2018 3:58 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: Eric

Last Name: Beard

Title: PG

Organization you are affiliated with: Shell Exploration and Production Company

Email:

City: Magnolia

State: Texas

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

I oppose the decision to discontinue regulation of practitioners of geoscience.

I understand the claim that there is a lack of historical evidence for public harm directly attributable to unqualified or unlicensed geoscientists. It should be understood, however, that the harm that can occur due to incompetent practice of geology can be widespread and catastrophic from just one such incident. As an example, thousands have lost their lives and billions of dollars of property damage has occurred due to incompetent assessment of proposed dam locations, both in the United States and abroad.

Understanding flood-plains and the risks/hazards associated with building on them is a function that can be performed by professional geologists that should hit closer to home in light of recent tragic flooding events. I personally spent over 85 hours mucking out homes that were affected by flooding due to Hurricane Harvey, and I personally would feel much more comfortable as we now scramble to improve drainage and flood control measures to know that the geologists performing assessments for these important public services are competent and that their practice is regulated, because indeed thousands of lives are potentially impacted by incompetent practice of geology in such matters.

The document also cited that half of the practicing geoscientists in Texas are exempt from regulation. First of all, this should have no bearing on the necessity of having competent geoscientists filling those roles that are certainly not exempt from regulation and should be regulated. I am a geologist currently working in Oil and Gas, and as such am exempt from regulation. I recently applied for and received my Professional Geology license in the state, because in roles in onshore oil and gas development, professional licensure lends credibility when working with local and federal regulatory agencies that have geoscientists that are licensed. Also, my personal aspirations are to transition from my job in Oil and Gas into a career working with the public in which my work would (and should) be regulated under the board. Because of the Oil and Gas sector, this state employs more geoscientists than most in jobs that do not currently require regulation (though arguably, there are many roles in the industry that SHOULD be

regulated), there are still many of us that still want to progress our careers and improve our future employment prospects by obtaining licensure with a state organization. In studying for my exams, I became a much better geologist and have improved my interpretations and increased productivity in my current role in Oil and Gas as a result. This regulation helps ensure that we have more competent geoscientists working in all sectors, whether their current role needs to be regulated by the board or not.

I firmly believe it is not in the best interest of the state, or the public, to de-regulate the practice of geoscience, as the assessments geoscientists provide could potentially affect the quality of life of thousands of people, billions of dollars, and our most precious resources. We need to continue to ensure that only competent professionals are allowed to practice.

Any Alternative or New Recommendations on This Agency: I do propose a possible alternative. If it is determined that the Texas Board of Professional Geoscientists does need to be abolished, I still think it is important to regulate licensure of geoscientists in some manner. Perhaps licensing of geoscientists could become a minor function of another agency, such as the Railroad Commission of Texas, or the Texas Commission on Environmental Quality. In Utah, for example, there is no body created to specifically regulate the practice of geology. Instead, licensing for professional geologists simply falls within the Department of Public Licensing. I believe in this State we could continue to demand competent geoscientists through proper licensing while significantly reducing the budget required to do so by doing something similar.

My Comment Will Be Made Public: I agree