

From: [Sunset Advisory Commission](#)
To: [Brittany Calame](#)
Subject: FW: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Thursday, August 16, 2018 7:54:49 AM

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

From: sunset@sunset.texas.gov <sunset@sunset.texas.gov> On Behalf Of Texas Sunset Commission
Sent: Thursday, August 16, 2018 7:27 AM
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: Daniel

Last Name: Brevard

Title: Project Manager

Organization you are affiliated with: ACCENT Environmental Services, Inc.

Email:

City: Lufkin

State: Texas

Your Comments About the Staff Report, Including Recommendations Supported or

Opposed: I strongly disagree with the Sunset Committee and feel the PG board and rules are absolutely essential to provide quality assurance and quality control (QA/QC) over geological work provided by professional licensed geoscientists. Texas is a state that is heavily involved in various geoscience activities and it would be thinking very small and going backwards to do away with the PG board and rules which play a huge part in protecting Texas Geology. The very agencies mentioned such as the TCEQ rely heavily on licensed PGs to provide quality geological data that can be relied upon.

These agencies would be required to re-write thousands of pages of guidance documents to provide the same level of QA/QC that is already a part of the current PG rules and governed wisely by the PG board. It is well accepted that a licensed person is held to a higher standard due to potential penalties and loss of income over a non-licensed person. By doing away with the PG rules and board, work would revert back to what it was 25 years ago.

Geological work for the people of Texas would suffer as we saw before the PG rules and board. And finally, even Louisiana has PG rules and a board as most other states also. Again, it is very small thinking to even consider dissolving or letting some other agency absorb something that is already in place and working well. Other points are mentioned as reasons to sunset the PG board and rules and are so "fake" that they are not even worth mentioning.

Any Alternative or New Recommendations on This Agency:

Railroad Commission and "oil-field" geologists should adhere to a higher standard and be under the influence of the PG rules and Board. We are now seeing the result of not having proper control over geology in the oil field industry such as earthquakes and sinkholes in places where fracking and injection are taking place. This will only get worse over time and can eventually impact Texas groundwater. Provide more power to the PG Board to penalize and fine these "violators".

PG Board should require state agencies such as the TCEQ to higher standards and influence to mitigate "arm-chair" geology by regulators that do not hold a professional license. We are also seeing the same "arm-chair" geology employed by insurance which is biased toward the insurance company and not the geology and groundwater or

Texas. This is also going to become worse over time, especially if there is no control by a PG board and the PG rules.

My Comment Will Be Made Public: I agree