

**From:** [Sunset Advisory Commission](#)  
**To:** [Brittany Calame](#)  
**Subject:** FW: Public Input Form for Agencies Under Review (Public/After Publication)  
**Date:** Thursday, August 16, 2018 3:42:28 PM

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

From: sunset@sunset.texas.gov <sunset@sunset.texas.gov> On Behalf Of Texas Sunset Commission  
Sent: Thursday, August 16, 2018 3:30 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: Paul

Last Name: Britt

Title: Geologist

Organization you are affiliated with: Independent Geoscientist

Email:

City: Houston

State: Texas

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

As a recent past President of the American Association of Petroleum Geologists and a Lifetime Honorary Member of the Houston Geological Society, I am one of those P.G.s who grandfathered in during the beginning of the TBPG. I am certified by three professional societies and am also Licensed in Louisiana, which was modelled after the Texas P.G. While most of my work is in the energy sector of geoscience, which is theoretically exempt for the Bill, I have had to use my P.G. in filing certain Texas Railroad Commission documents and have used it in qualifying statements for testimony in hearings before the Railroad Commission. Admittedly, the sun setting of the Texas P.G. may not have immediate adverse effects in my work, but the fact that the P.G. is recognized by the State of Texas underscores its significance.

We live in a time where there is an increasing perception that qualified persons are needed in the protection of public health and safety. A case in point is the fact that international geoscientists, who previously thought any licensing or certification was superfluous, are now actively seeking certification in the post-Macondo world which brought safety and work skills to the public forefront, and are encouraged, even required, to do so by their employers. The AAPG is presently working in this direction satisfy the need.

But the fact is, the State of Texas does not recognize professional society certification as adequate in this regard. So the sun setting of the P.G. will leave the State without a process for qualifying geoscientists that do work directly with public health and safety.

I have many friends and associates that work in the groundwater and environmental industry, and I have concerns that prior to the establishment of the P.G., much of the work being performed in investigating groundwater contamination, groundwater quality, flood control, induced seismicity, subsidence and surface faulting was being performed by untrained or under-trained firms and individuals. These are things that do directly affect the public. The fact that there have not been high numbers of prosecutions is not indicative of a lack of need for the P.G., rather an endorsement that the law is being taken seriously.

I would encourage the sunset committee to reconsider their position. I understand, and in fact generally support, the reduction of government oversight, but I think the need for the P.G. in maintaining the integrity of the professional geoscientist for the public welfare is, in this case, needed.

Any Alternative or New Recommendations on This Agency: The official, legislative recognition of one or more professional society certifications to fill the role of the TBPG would be an alternative, but would need to be done without a gap in coverage between the TBPG and any such organizations.

My Comment Will Be Made Public: I agree