

**From:** [Sunset Advisory Commission](#)  
**To:** [Brittany Calame](#)  
**Subject:** FW: Public Input Form for Agencies Under Review (Public/After Publication)  
**Date:** Thursday, August 16, 2018 12:09:28 PM

---

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

From: sunset@sunset.texas.gov <sunset@sunset.texas.gov> On Behalf Of Texas Sunset Commission  
Sent: Thursday, August 16, 2018 11:39 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: Brendan

Last Name: Hargrove

Title:

Organization you are affiliated with:

Email:

City: HOUSTON

State: Texas

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

I am a senior geologist working in the petroleum industry for a medium-sized domestic petroleum company in Houston, TX. My experience includes geologic operations, exploration, and development work in multiple basins across the United States. I have both BS and MS degrees in Geology.

I am against the Commission's recommendation to abolish the Texas Board of Professional Geoscientists. While it is probably true that there has to date been no significant public harm caused by unlicensed geoscientists, that the majority of currently licensed geoscientists have been grandfathered in (primary on the merit of significant professional experience), and that the majority of geoscientific professions are exempt from requiring licensure in Texas, these considerations are likely interrelated and may not be true in the near future.

As the Commission is well aware, licensure of professional geoscientists did not begin in Texas until 2001, and when the regulation was created most geoscientific disciplines were made exempt. Those geoscientists that did choose to become licensed (my supervisor included) were granted their license by merit of experience. Therefore, although most did not take the ASBOG exam, they were by no means unqualified. As this group of geoscientists begins to retire in greater number, and new geoscientists seek licensure, the proportion of licensed geoscientists in Texas that have passed the exam will likely grow significantly.

Additionally, the lack of public harm attributable to unqualified geoscientists in Texas cannot be taken as assurance that future harm may not occur, nor can we ignore incidents that have occurred in other states. For an extreme example of what can occur when proper geologic study is not undertaken, please research the history of the St. Francis Dam, the collapse of which has been attributed to geologic misinterpretation and mistaken assumptions, and which caused the deaths of several hundred individuals.

Incidents of public harm brought about by unqualified geoscientists may be rare, but they are not absent.

Finally, it is worth mentioning that the vast majority of states in the United States have policies for licensing professional geoscientists. By failing to license our own, we risk being incapable of ensuring the quality of our geoscientists, preventing them from being able to apply for reciprocal licensure (and work) in neighboring states, and effectively alienating our geoscientific community from that of the rest of the United States. I myself, despite working in a field that is exempt, am actively pursuing my PG license and due to take the ASBOG exam in October. I am doing so in order to prove my expertise to myself and my colleagues and to create the opportunity of starting a professional consultancy business in the next several years. I believe it is important to leave our state the means to denote geoscientific experts just as we do with engineering experts, considering that both fields can (and often do) dramatically impact public works, environmental quality, and public safety.

Any Alternative or New Recommendations on This Agency: Rather than abolish the Texas Board of Professional Geoscientists, I believe that the current Texas Geoscience Practice Act should be amended to remove licensure exemptions for the majority of geoscientific disciplines, requiring instead that any geoscientist working in a professional capacity either work under a licensed supervisor (as is currently the case with environmental geologists/consultants) or obtain a license themselves. This action would simultaneously increase the number of licensed professional geoscientists that have taken the ASBOG exam, provide incentive to attain licensure, and ensure that the quality of Texas Professional Geoscientists remains competitive with those from other states.

My Comment Will Be Made Public: I agree