

From: [Sunset Advisory Commission](#)
To: [Brittany Calame](#)
Subject: FW: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Wednesday, August 22, 2018 4:18:00 PM

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

From: sunset@sunset.texas.gov <sunset@sunset.texas.gov> On Behalf Of Texas Sunset Commission
Sent: Wednesday, August 22, 2018 3:48 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: Rick

Last Name: Robertson

Title: President

Organization you are affiliated with: Terra-Solve, Inc.

Email:

City: Carrollton

State: Texas

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

I oppose the recommendations of the staff report with the following comments:

1. The TBPG is self-funded. Costs nothing to the public and provides oversight to an important component of Texans lives, whether they, or the committee, realizes it.
2. Lack of enforcement can mean a toothless agency. But it can also mean self-policing is going on by professionals who value the license they worked hard to obtain and do not wish to endanger their livelihood. It seems disingenuous for the committee to argue that because not many enforcement cases exist we should get rid of the only mechanism for bringing enforcement in the future.
3. As has been pointed out ad nauseum, the percentage of grandfathered PGs will decrease with time and is in line with other boards at a similar number of years.
4. Please take seriously the comments of the numerous TCEQ regulators who can assert that the quality of geological work they are reviewing has gone up measurable since the inception of the PG program. They are on the front lines on this issue.
5. Recognize the serious costs to a great number of Texas businesses and citizen taxpayers should their ability to compete on intrastate projects if their home state undercuts their professional standing.
6. Question: does the Sunset committee have to conduct a cost analysis for all the rules which will have to be rewritten should the Board be abolished?

tl;dr: if it ain't broke, don't fix it

Any Alternative or New Recommendations on This Agency: Although a weak argument, if more enforcement is in any way a good measure of the need for a board, make penalties harsher and by all means try to bring in at least some components of oil and gas exploration, particularly for well plugging and proper sealing, under the requirement for PG oversight

My Comment Will Be Made Public: I agree