

From: [Sunset Advisory Commission](#)
To: [Brittany Calame](#)
Subject: FW: Public Input Form for Agencies Under Review (Public/After Publication)
Date: Thursday, August 2, 2018 2:13:24 PM

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From: sunset@sunset.texas.gov <sunset@sunset.texas.gov> On Behalf Of Texas Sunset Commission
Sent: Thursday, August 2, 2018 2:11 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: Mary Kathleen

Last Name: Vail

Title:

Organization you are affiliated with:

Email:

City: Lubbock

State: Texas

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

As a professional geoscientist who has been practicing for over 30 years, I believe firmly in the regulation of the practice of geoscience. Prior to licensing, I saw a person claiming to be a geologist, providing testimony to the then Texas Water Commission. The extent of experience was two undergraduate introductory geology classes. As a former state worker, I reviewed documents that should have been forwarded to the PG Board, however my management refused to allow the referral. Sometimes the work was so substandard that it was unusable. In some instances, the person who submitted the geologic reports was an engineer with little to no geologic training. Other times, the person had no professional qualifications at all and the reports or proposals were illogical and unusable.

Yes, many older geologists were grandfathered, but many of us have since taken and passed the ASBOG exams. I am one of those originally grandfathered who has since passed both exams. Many of the older grandfathered geoscientists are retiring or dying, so the problem of grandfathered geoscientist who have not passed the exams, should be a dwindling issue. I believe that the Fundamentals and Practice of Geoscience are an important criteria to practice geoscience, just as the Fundamentals and Practice of Engineering exams are important to the engineering profession. They both ensure that a minimum standard is met.

The exemption of those in the oil industry was done because of political pressure from those geologists. Even petroleum geologists must be licensed to submit reports and testimony before the Texas Railroad Commission. When I was taking the exams, there were several petroleum geologists who were also taking the exams, because they were required so that they could testify in court or before regulatory agencies.

The purpose of hiring a PG is to ensure that a person making recommendations has the knowledge and experience to make a good recommendation and to protect human health and safety. The same can be said of many engineers. Not all engineers work in areas of critical health and safety (ex dam safety), but all need to have proof that they meet the minimum criteria set forth by their board. Incompetent individuals posing as geoscientists or engineers can result in

cost overages and potential problems. For example, failure to identify caves and other karst-like features can result in problems with sinkholes. Geoscientists and geophysicists are needed to identify such problems. PGs are necessary to oversee and direct work of a geologic nature.

As an environmental geologist, I direct and oversee site assessment and remediation. I interpret soil and groundwater data in order to create a site model that will allow for a timely and cost-effective solution. I work with engineers but we are not interchangeable. We each have our own area of expertise and work together to solve problems.

Any Alternative or New Recommendations on This Agency:

The PG board has been granting exemptions from taking the exam. I believe that this practice should stop. The argument has been that people do not practice in all areas. None of us do. While I have worked primarily in the environmental area and had been out of school for over 25 years, I was able to pass both exams the first time I took them, because I studied extensively and applied basic geologic practices and principles to answer the exam questions.

I also recommend that other state government agencies be required to submit poor geologic work to the PG board for review and possible enforcement. I also recommend that individual state employees who are PGs, be allowed to refer questionable material to the PG board, without interference from their management.

My Comment Will Be Made Public: I agree