

**From:** [Sunset Advisory Commission](#)  
**To:** [Brittany Calame](#)  
**Subject:** FW: Public Input Form for Agencies Under Review (Public/After Publication)  
**Date:** Friday, August 3, 2018 2:26:54 PM

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

From: sunset@sunset.texas.gov <sunset@sunset.texas.gov> On Behalf Of Texas Sunset Commission  
Sent: Friday, August 3, 2018 1:42 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: Donald

Last Name: Yezerksi

Title: Petroleum Geologist

Organization you are affiliated with: Noble Energy

Email:

City: Houston

State: Texas

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

As a petroleum geologist residing and employed in the state of Texas, I strongly encourage the Commission to reverse its initial recommendation to dissolve the Texas Board of Professional Geoscientists (TBPG) and its issuance and regulation of the Professional Geoscientist (PG) license.

Much of a geoscientist's work attempts to mitigate problems that impact an ignorant public on large scales or long timescales. Recommending solutions to prevent or remediate regional groundwater contamination or identify sinkhole risks underlying new or existing public infrastructure are just two brief examples where the education and experience of a geoscientist could have outsized impacts on the health and safety of generations of unsuspecting Texans. Ensuring that the public is minimally safeguarded from malpractice in these and numerous other scenarios is a basic function of government. Failure to do so would be as imprudent as allowing the unregulated practice of medicine or law.

The Commission found few complaints against those engaged in the practice of geoscience; however, both myself and the geoscience community think this reflects both good fortune and the limited time for geologic problems to manifest rather than evidence that regulation of professional licenses is unnecessary. Furthermore, the Commission's finding that the lack of a PG license requirement in some geoscience occupations in Texas is evidence that the TBPG is unnecessary is contrary to the prevailing regional and national trend where employers of geoscientists have typically added a PG requirement.

Given these external factors, repeal of the PG licensure process would put Texas at a competitive disadvantage to our regional neighbors. Out-of-state environmental and geotechnical consulting firms would boast of superior technical staffs, and local governments and businesses would be less inclined to keep project dollars within the state. For these reasons and many others, it is firmly in Texas' and Texans' long-term physical and financial health that the Commission reverse its initial recommendation and for the TBPG to continue to issue and regulate PG licenses.

Any Alternative or New Recommendations on This Agency: I concur with the logic of the Commission that the large percentage of current PG license holders who were granted their license by the "grandfathering" process diminishes the proof of competence standard for which the TBPG was created to provide. I would endorse a rule change within the structure of the TBPG that licenses cannot be renewed unless the license holder has met the same qualifications as new applicants.

My Comment Will Be Made Public: I agree