



David Killam
Chairman

D. Todd Staples
President

November 6, 2018

Texas Sunset Advisory Commission
P.O. Box 13066
Austin, Texas 78711

Dear Chairman Birdwell and Vice Chairman Paddie,

The Sunset Commission is currently recommending that the Texas Board of Professional Geoscientists (TBPG) and its licensing responsibilities be abolished. The Texas Oil and Gas Association (TXOGA) opposes this recommendation. The TBPG protects the public by licensing qualified professional geoscientists, and many states have a similar geoscience licensing program.

One of the main arguments for abolishing the TBPG is that it provides no measurable public benefit. However, Texas Commission on Environmental Quality (TCEQ) requires a professional geologist (PG) to stamp and sign reports in several of their programs. Also, PGs are important to remediation programs of the Railroad Commission (RRC). When there is accidental contamination through exempt activities, PGs and professional engineers are required to assess and address the contamination. Therefore, the oil and natural gas industry relies on licensed geologists to comply with regulatory programs, and it unclear from the recommendation how the state would address these compliance requirements in the absence of an entity that acts to license geologists.

TXOGA urges the Sunset Commission to reject the recommendation to abolish the TBPG and its licensing responsibilities. We firmly believe that this is not in the best interest of the state, oil and natural gas industry, and the public.

Sincerely,

A handwritten signature in blue ink that reads "Todd Staples".

Todd Staples
President
Texas Oil & Gas Association