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From: rrcwebcontact@gmail.com
Sent: Monday, November 30, 2015 4:51 PM
To: rulescoordinator
Subject: Comment Form for Proposed Rulemakings



Comments Form for Proposed Rulemakings

Date Submitted

Monday, November 30, 2015 5:50:36 PM

Submitted By

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Amend §3.86 and other rules re: UFT fields

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I feel that I could offer my support to the proposed rule change with one major alteration to its current format; I do not believe that there is any aspect of the professional training or education of a proto-typical licensed professional engineer that would prepare a reasonably prudent practitioner of Professional Engineering in the State of Texas to render a well reasoned and defensible opinion on the limits of ownership inherent in the creation of permit drawings and submittals as required by the Texas RRC. In every case due to the nature of the information required in the existing permit application packages the limit of real property ownership (specifically but not limited solely to mineral rights and their extent of ownership) is required to be identified and dimensioned on the face of the permit application. Current federal and state law makes the delineation and depiction of the limits of ownership of real property the purview solely of the licensed and regulated professional land surveyor. Limits of ownership, including mineral interest, are land title boundaries and as such can not be performed by any practitioners of professional engineering. I would offer my support to this rule change once the stipulation in include professional engineers is removed.