

**Kellie Martinec**

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**From:** rrcwebcontact@gmail.com  
**Sent:** Tuesday, December 01, 2015 7:08 AM  
**To:** rulescoordinator  
**Subject:** Comment Form for Proposed Rulemakings



## Comments Form for Proposed Rulemakings

Date Submitted

Tuesday, December 01, 2015 8:08:19 AM

Submitted By

**Garrett Thompson, RPLS**

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## Amend §3.86 and other rules re: UFT fields

Amend §3.86 and other rules re: UFT fields

The below comment is in reference to Title 16. Economic Regulation, Part 1. Railroad Commission of Texas, Chapter 3. Oil and Gas Division, Section 3.86. Horizontal Drainhole Wells (g), (2), (B), (6) Plat Requirements

The proposed rule change reads:

(6) Plat requirements. All plats required by this section shall be prepared using blue or black ink and shall include a certification by a professional land surveyor registered in accordance with Texas Occupations Code, Chapter 1071, relating to Land Surveyors, or by a registered professional engineer registered in accordance with Texas Occupations Code, Chapter 1001, relating to Professional Engineers.

I generally support rule change, however the statement "by a registered professional engineer registered in accordance with Texas Occupations Code, Chapter 1001, relating to Professional Engineers." is requested to be removed. A Registered Professional Land Surveyor (RPLS) or a Licensed State Land Surveyor (LSLS) are the only professionals qualified to certify a boundary survey, and those doing so that are not registered are breaking the

law. Surveyors are qualified through education, an internship working under the direct supervision of a RPLS, rigorous testing specific to boundary law and reconstruction, and required continuing education, all regulated by the Texas Board of Professional Land Surveyors (TBPLS).

Again, I am requesting the statement "by a registered professional engineer registered in accordance with Texas Occupations Code, Chapter 1001, relating to Professional Engineers." be removed from the proposed rule change.

Thank you,  
Garrett Thompson, RPLS

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