

ATTACHMENT A: FINDINGS OF APPROVAL

1.0 CEQA FINDINGS

1.1 CEQA EXEMPTION

The Board of Supervisors finds that the Sable Offshore Corporation's Change of Owner, Operator, and/or Guarantor for the Santa Ynez Unit (SYU), Pacific Offshore Pipeline Company (POPCO) Gas Plant, and Las Flores Pipeline System Final Development Plan Permits are not subject to the requirements of the California Environmental Quality Act (CEQA), as they do not constitute a "project", as defined by CEQA Guidelines Section 15378(b)(5), as they consist of administrative activities of government that will not result in direct or indirect changes to the environment. Please see Attachment C, Notice of Exemption.

2.0 ADMINISTRATIVE FINDINGS

The Set Hearing Board Letter dated February 2, 2025, the Board Agenda Letter dated February 25, 2025, and the Planning Commission Staff Report dated October 22, 2024, including all of their attachments for the Sable Offshore Corporation's Change of Owner, Change of Guarantor, and Change of Operator for the SYU Permit No. 87-DP-32cz (RV06), the Change of Guarantor and Change of Operator for the POPCO Gas Plant Permit No. 93-FDP-015 (AM03), and the Change of Guarantor and Change of Operator for the Las Flores Pipeline System Permit No. 88-DPF-033 (RV01)z, 88-CP-60 (RV01) (88-DPF-25cz; 85-DP-66cz; 83-DP-25cz) are incorporated by reference herein.

2.1 CHANGE OF OWNER, OPERATOR, AND GUARANTOR FOR THE SANTA YNEZ UNIT ONSHORE FACILITIES, FINAL DEVELOPMENT PLAN PERMIT NO. 87-DP-32cz (RV06)

2.1.1 Findings required for Change of Owner

In compliance with Section 25B-9(a) of the County Code, prior to the approval of an application for a change of owner, the director shall make the following findings:

(1) Fees and Exactions. All outstanding county required fees and exactions due for the facility have been paid.

The requirements of this finding are satisfied. Planning and Development has verified with Accounting staff that no outstanding payments are due for the facility, or related planning and compliance cases.

(2) Financial Guarantees. All necessary insurance, bonds or other instruments or methods of financial responsibility approved by the county and necessary to comply with the permit and any county ordinance have been updated, if

necessary, to reflect the new owner(s) and will remain in full effect following the ownership change.

The requirements of this finding are satisfied. Previously required bonds and endowments under the Santa Ynez Unit Final Development Plan Permit have been satisfied and none remain outstanding. Permit Condition No. XI-2.w requires the permittee to be responsible for the cleanup of all affected coastal and onshore resources, and for the successful restoration of all affected areas and resources to prefill conditions in the event of an accidental spill of crude oil or gas products processed at the facilities. The Condition states that the permittee shall provide the County with copies of its Certificates of Financial Responsibility related to its offshore Santa Barbara operations. The permittee provided a copy of its California Department of Conservation, Office of Spill Prevention and Response issued Certificate of Financial Responsibility to the County on October 3, 2024 (Certificate No. 2-2623-00-001), which meets the finding requirements to update instruments of financial responsibility to reflect the new Owner, Guarantor, and Operator. Permit Condition No. XIX-1 requires the permittee to be responsible for the proper abandonment of the facility, and that at the time of final abandonment, determined at a noticed public hearing, the County shall direct the permittee to either post a performance bond, or continue to pay property taxes until abandonment and site restoration is complete. Therefore, if the County directs the permittee to post a decommissioning performance bond, it will be done so at the determination of final abandonment. A decommissioning bond is not yet required to be submitted to the County as the facility has not been permanently shut-down.

(3) Acceptance of Permit. The proposed owner has provided a letter from a responsible official representing the proposed owner formally accepting all, conditions and requirements of the permit.

The requirements of this finding are satisfied. Sable provided a signed Agreement to Comply with Conditions of Approval dated March 14, 2024 accepting all conditions and requirements of the permit. The Agreement was recorded by the County Clerk-Recorder's office on September 13, 2024 as an official record. The Agreement is provided in Attachment D of the Planning Commission Staff Report dated October 22, 2024, and is included herein by reference.

(4) Facility Safety Audit. The current owner or operator has provided a copy of the most recent county-conducted comprehensive safety audit of the physical facility, along with a description of the status of implementing its recommendations, to the new or proposed new owner(s). A safety inspection maintenance and quality assurance program (SIMQAP) audit approved by the appropriate county official shall satisfy this requirement.

The requirements of this finding are satisfied. The most recent County-conducted safety audit of the Las Flores Canyon Facilities (SYU and POPCO Gas Plant) was conducted on July 16 -17, 2014 by the County's Systems Safety & Reliability Review Committee. The 2014 audit observed 62 items that needed to be addressed from minor housekeeping items, to items that would cause a low potential for serious personal injury, negative environmental impact, property damage, or hazardous material release. All items were addressed by September 11, 2015, except for minor repairs required on an evaporative cooler and a crude oil emulsion heater, which were subsequently repaired. Following the 2014 SIMQAP audit, the Las Flores Canyon Facilities were placed into a preserved state due to the 2015 Plains pipeline oil spill, which is the only currently permitted transportation method to transport crude oil from the SYU. On July 9, 2015, the System's Safety & Reliability Review Committee approved the deferral of annual SIMQAP audits until the Las Flores Canyon Facilities resume production. Sable has a copy of the 2014 audit and its recommendations, and continues to provide maintenance reports on the Las Flores Canyon Facilities to the System's Safety & Reliability Review Committee monthly.

(5) Compliance With Existing Requirements. As of the date that the application is deemed complete, the current owner(s) are in compliance with all requirements of the permit, including any requirement of a county-required safety audit, any notice of violation, and any county ordinance, or the current and proposed owner(s) have entered into a written agreement with the Director that specifies an enforceable schedule to come into compliance with such requirements.

The requirements of this finding are satisfied. The permittee is in compliance with all requirements of the Final Development Plan Permit and all County ordinances as of the date the application was deemed complete on July 30, 2024. Records of the most-recent safety audit were provided to the new owner, as described in Finding 2.1.1 (4) above. No County notice of violation had been issued for the facility at the time the applications were determined to be complete on July 30, 2024. No County permit compliance issues, or corrective actions that would require a written agreement with the Director were present at the time the applications were determined to be complete on July 30, 2024.

2.1.2 Findings required for Change of Guarantor

In compliance with Section 25B-9(e) of the County Code, prior to the approval of an application for a change of guarantor, the director shall make the following findings:

(1) Financial Guarantees. The proposed guarantor has provided all necessary instruments or methods of financial responsibility approved by the county and necessary to comply with the permit and any county ordinance.

Sable is the Guarantor for the Santa Ynez Unit. The requirements of this finding are satisfied, as discussed under the similar finding for Change of Owner in Finding 2.1.1 (2).

2.1.3 Findings required for Change of Operator

In compliance with Section 25B-10 of the County Code, the planning commission shall approve an application for change of operator only if the planning commission makes the following findings.

(1) Fees and Exactions. All outstanding county required fees and exactions due for the facility have been paid.

Sable is the Operator of the Santa Ynez Unit. The requirements of this finding are satisfied, as discussed under the similar finding for Change of Owner in Finding 2.1.1 (1).

(2) Financial Guarantees. All necessary insurance, bonds or other instruments or methods of financial responsibility approved by the county and necessary to comply with the permit and any county ordinance have been updated, if necessary, to reflect the new operator and will remain in full effect following the operator change.

The requirements of this finding are satisfied, as discussed under the similar finding for Change of Owner in Finding 2.1.1 (2).

(3) Acceptance of Permit. The proposed operator has provided a letter from a responsible official representing the proposed operator formally accepting all conditions and requirements of the permit.

The requirements of this finding are satisfied, as discussed under the similar finding for Change of Owner in Finding 2.1.1 (3).

(4) Facility Safety Audit. The current owner or operator has provided a copy of the most recent county-conducted comprehensive safety audit of the physical facility, along with a description of the status of implementing its recommendations, to the proposed new operator. A safety inspection maintenance and quality assurance plan audit approved by the appropriate county official shall satisfy this requirement.

The requirements of this finding are satisfied, as discussed under the similar finding for Change of Owner in Finding 2.1.1 (4).

(5) Compliance with Existing Requirements. As of the date that the application is deemed complete, the current operator is in compliance with all requirements of the permit, including any requirements of a county-required safety audit, any notice of violation, and any county ordinance, or the owner and proposed operator have entered into a written agreement with the director that specifies an enforceable schedule to come into compliance with such requirements.

The requirements of this finding are satisfied, as discussed under the similar finding for Change of Owner in Finding 2.1.1 (5).

(6) Compliance Plans. The current owner and proposed operator have updated, where applicable, any existing, approved safety inspection maintenance and quality assurance program, emergency response plan, fire protection plan, and oil spill contingency plan, or equivalent approved plans, with current emergency contact information pertaining to the new operator. The current owner and proposed operator have agreed in writing to revise all other plans required by the permit or any county ordinance, as necessary to reflect the change of operator, and to do so with sufficient diligence to obtain approval of the revised plans by the appropriate county official within six months after assuming operations.

The requirements of this finding are satisfied. All existing and approved safety inspection maintenance and quality assurance program, emergency response plan, fire protection plan, and oil spill contingency plan, or equivalent approved plans have been updated with the current emergency contact information pertaining to Sable. Secondary compliance plans required by the Final Development Plan permit have also been updated with the current emergency contact information pertaining to Sable. Compliance Plans subject to this finding include the following, and are outlined in Table 1.1 of the Planning Commission Staff Report dated October 22, 2024, and are included as Attachment F to the Planning Commission Staff Report dated October 22, 2024, and are incorporated by reference herein.

Plan Name	Santa Ynez Unit Final Development Plan Permit Condition	POPCO Final Development Plan Permit Condition
Emergency Response Plan	XI-2.c.	P-3
Fire Protection Plan	X1-2.i.	N-3
Groundwater Management Plan	XVI-1	-
Integrated Noise Monitoring Plan	XV-1	L-2
NGL Inventory Management Plan	VI	P-6
Preservation Plan	-	-
Santa Barbara Harbor Use Plan	X-19	-
Site Security Plan	XI-2.h.	-
SIMQAP	XI-2.a.	P-2
Surface Water Monitoring Plan	XVII-1	H-1
Transportation Risk Management and Prevention Program	VI	P-7

(7) Transitional Plan. The current owner or operator and proposed operator have submitted a transitional plan that will demonstrate the proposed operator shall receive adequate training, including by means of cross training by the current operator, where feasible, and shall have a good working knowledge of the crucial compliance plans listed in Sec. 25B-10.1.f before assuming control of operations. The plan has been approved by the director. The planning commission may exempt the current owner and proposed operator from this requirement, or portions thereof, for good cause.

The requirements of this finding are satisfied. Sable submitted a comprehensive Transition Plan describing the general strategy taken for the transition from ExxonMobil Corporation to Sable, a description of the facilities and general operating procedures, details on the staffing and support employees, and asset-specific training and general training conducted. To demonstrate a good working knowledge of the crucial compliance plans listed in County Code Chapter 25B-10.1.f, and listed above in Finding 2.1.3 (6), Compliance Plans were approved by Sable's senior staff and leadership employees, and were received and reviewed by Sable's field employees based on the applicability of each plan to the particular employee's responsibilities. Emergency Response-related plans were distributed to all staff and are routinely reviewed during safety meetings and scheduled emergency drills (see Finding 2.1.3[8] below). The Transition Plan, with a signed statement confirming the operator's adequate training and working knowledge of the facilities compliance plans, is included as Attachment E-1 to the Planning Commission Staff Report dated October 22, 2024, and is incorporated by reference herein.

(8) Emergency Response Plan Drills. The proposed operator has adequately performed one or more county approved emergency response plan drills necessary to respond to emergency episodes that may occur at the facility.

The requirements of this finding are satisfied. Sable submitted an updated Emergency Response Plan and staffing details for their Incident Management Team who run the response drills. Sable held a comprehensive emergency response drill on September 19, 2024 in coordination with the County Fire Department's Office of Emergency Services, and other regulatory agencies. The County Fire Department confirmed that the emergency response drill was completed in accordance with County requirements, and that no outstanding issues were identified.

(9) Operator Capability. The proposed operator has the skills and training necessary to operate the permitted facility in compliance with the permit and all applicable county codes and has a good working knowledge of the crucial compliance plans listed in Sec. 25B-10.1.f. The director shall require relevant records of compliance, and corrective actions taken subsequent to any major incidents for facilities, if

any, that are similar in nature to those that are the subject of the permit, as may be necessary to make findings. These records shall be used to provide sufficient assurance that the proposed operator does not reflect a record of non-compliant or unsafe operations systemic in nature for similar facilities to those being considered for operatorship.

The requirements of this finding are satisfied. As described in the Planning Commission Staff Report dated October 22, 2024 and included by reference herein, Sable was formed in October 2020 as an independent oil and gas company headquartered in Houston Texas as a special purpose acquisition company. Sable's Executive Management Team have managed oil and gas exploration and production businesses in the Pacific Ocean, the Gulf of Mexico, and onshore California for more than 30 years. Specific to Santa Barbara County, the Executive Management Team has successfully operated Platform Irene and the associated Lompoc Oil & Gas Plant and Point Pedernales Pipelines, and Platforms Harvest, Hidalgo, Hermosa and the associated Gaviota Oil & Gas Plant and Point Arguello Pipelines under former management of Plains Exploration and Production Company and Freeport-McMoRan, Inc. Sable's Upper Management Team have carried over from similar leadership roles at their previous companies, with an average of 31 years of experience operating oil and gas facilities within the County. Sable's Onsite Middle Management Team have all transferred over from similar roles at the Las Flores Canyon Facilities under ExxonMobil, with an average of 21 years of experience working at the facilities. Approximately 64 percent of the onsite facility employees have also transferred over in their same or similar capacity from ExxonMobil. These years of industry experience and high employee transfer rate from ExxonMobil demonstrates that Sable has the skills and training necessary to operate the permitted facility in compliance with the permit and all applicable county codes. All employees and management have been trained on the facility-specific Compliance Plans, as described in Findings 2.1.3 (6) and 2.1.3 (7) above, demonstrating that employees have a good working knowledge of the facility's crucial compliance plans. Sable has had zero major incidents involving crude oil and gas facilities within the U.S. while managing Sable Permian Resources from 2017 – 2021, FMOG from 2013 – 2017, and PXP from 2009 – 2013.

2.2 CHANGE OF OPERATOR AND GUARANTOR FOR THE PACIFIC OFFSHORE PIPELINE COMPANY GAS PLANT, FINAL DEVELOPMENT PLAN PERMIT NO. 93-FDP-015 (AM03)

2.2.1 Findings required for Change of Guarantor

In compliance with Section 25B-9(e) of the County Code, prior to the approval of an application for a change of guarantor, the director shall make the following findings:

- (1) Financial Guarantees. The proposed guarantor has provided all necessary instruments or methods of financial responsibility approved by the county and necessary to comply with the permit and any county ordinance.*

The requirements of this finding are satisfied. No bonds are in place for the POPCO Gas Plant, nor are any currently required by the County permit or any County ordinance. Final Development Plan Permit Condition Q-2 requires the permittee to be responsible for the proper abandonment of the facility, and that a performance bond or other security device be in place immediately following the permanent shutdown of the facility. A performance bond, or other security device shall be posted by POPCO following permanent shut down of the facilities in accordance with an approved abandonment and restoration plan in effect at that time, in an amount determined by the County. A decommissioning bond is not yet required to be submitted to the County as the facility has not been permanently shut-down.

2.2.2 Findings required for Change of Operator

In compliance with Section 25B-10 of the County Code, the planning commission shall approve an application for change of operator only if the planning commission makes the following findings.

- (1) Fees and Exactions. All outstanding county required fees and exactions due for the facility have been paid.*

The requirements of this finding are satisfied. Planning and Development has verified with Accounting staff that no outstanding payments are due for the facility, or related planning and compliance cases.

- (2) Financial Guarantees. All necessary insurance, bonds or other instruments or methods of financial responsibility approved by the county and necessary to comply with the permit and any county ordinance have been updated, if necessary, to reflect the new operator and will remain in full effect following the operator change.*

The requirements of this finding are satisfied, as discussed under the similar finding for Change of Guarantor in Finding 2.2.1 (1).

- (3) Acceptance of Permit. The proposed operator has provided a letter from a responsible official representing the proposed operator formally accepting all conditions and requirements of the permit.*

The requirements of this finding are satisfied. Sable provided a signed Agreement to Comply with Conditions of Approval dated March 14, 2024 accepting all conditions and requirements of the permit. The Agreement was recorded by the County Clerk-Recorder's office on September 13, 2024 as an official record. The Agreement is provided in Attachment D of the Planning Commission Staff Report dated October 22, 2024, and is included herein by reference.

(4) Facility Safety Audit. The current owner or operator has provided a copy of the most recent county-conducted comprehensive safety audit of the physical facility, along with a description of the status of implementing its recommendations, to the proposed new operator. A safety inspection maintenance and quality assurance plan audit approved by the appropriate county official shall satisfy this requirement.

The requirements of this finding are satisfied as discussed under the similar finding for the Santa Ynez Unit Change of Owner Finding 2.1.1 (4). The POPCO Gas Plant is subject to yearly County safety audits through its approved SIMQAP as overseen by the County's Systems Safety & Reliability Review Committee. The SIMQAP covers both the onshore Santa Ynez Unit facilities and the POPCO Gas Plant.

(5) Compliance with Existing Requirements. As of the date that the application is deemed complete, the current operator is in compliance with all requirements of the permit, including any requirements of a county-required safety audit, any notice of violation, and any county ordinance, or the owner and proposed operator have entered into a written agreement with the director that specifies an enforceable schedule to come into compliance with such requirements.

The requirements of this finding are satisfied. The current operator is in compliance with all requirements of the County permit and County ordinances as of the date the application was deemed complete on July 30, 2024. Records of the most-recent safety audit were provided to the new owner, as described in the similar finding for the Santa Ynez Unit Change of Owner Finding 2.1.1[4]. The safety audits for the SYU and the POPCO Gas Plant are incorporated together. No County notice of violation had been issued for the facility at the time the applications were determined to be complete on July 30, 2024. No County permit compliance issues, or corrective actions that would require a written agreement with the Director were present at the time the applications were determined to be complete on July 30, 2024.

(6) Compliance Plans. The current owner and proposed operator have updated, where applicable, any existing, approved safety inspection maintenance and quality assurance program, emergency response plan, fire protection plan, and oil spill contingency plan, or equivalent approved plans, with current emergency

contact information pertaining to the new operator. The current owner and proposed operator have agreed in writing to revise all other plans required by the permit or any county ordinance, as necessary to reflect the change of operator, and to do so with sufficient diligence to obtain approval of the revised plans by the appropriate county official within six months after assuming operations.

The requirements of this finding are satisfied as discussed under the similar finding for the Santa Ynez Unit Change of Operator Finding 2.1.3 (6). All POPCO Compliance Plans are integrated with the Santa Ynez Unit Compliance Plans, and have been updated to reflect the new operator’s emergency contact information.

Plan Name	Santa Ynez Unit Final Development Plan Permit Condition	POPCO Final Development Plan Permit Condition
Emergency Response Plan	XI-2.c.	P-3
Fire Protection Plan	X1-2.i.	N-3
Groundwater Management Plan	XVI-1	-
Integrated Noise Monitoring Plan	XV-1	L-2
NGL Inventory Management Plan	VI	P-6
Preservation Plan	-	-
Santa Barbara Harbor Use Plan	X-19	-
Site Security Plan	XI-2.h.	-
SIMQAP	XI-2.a.	P-2
Surface Water Monitoring Plan	XVII-1	H-1
Transportation Risk Management and Prevention Program	VI	P-7

(7) Transitional Plan. The current owner or operator and proposed operator have submitted a transitional plan that will demonstrate the proposed operator shall receive adequate training, including by means of cross training by the current operator, where feasible, and shall have a good working knowledge of the crucial compliance plans listed in Sec. 25B-10.1.f before assuming control of operations. The plan has been approved by the director. The planning commission may exempt the current owner and proposed operator from this requirement, or portions thereof, for good cause.

The requirements of this finding are satisfied as discussed under the similar finding for the Santa Ynez Unit Change of Operator in Finding 2.1.3 (7). The Transition Plan for the SYU incorporates the POPCO Gas Plant, and describes the general strategy taken for the transition from ExxonMobil Corporation to Sable, a description of the facilities and general operating procedures, details on the staffing and support employees, and asset-specific training and general training conducted. To demonstrate a good working knowledge of the crucial compliance plans, Compliance Plans were approved by Sable’s

senior staff and leadership employees, and were received and reviewed by Sable's field employees based on the applicability of each plan to the particular employee's responsibilities. Emergency Response-related plans were distributed to all staff and are routinely reviewed during safety meetings and scheduled emergency drills. The Transition Plan, with a signed statement confirming the operator's adequate training and working knowledge of the facilities compliance plans, is included as Attachment E-1 to the Planning Commission Staff Report dated October 22, 2024 and is incorporated by reference herein.

(8) Emergency Response Plan Drills. The proposed operator has adequately performed one or more county approved emergency response plan drills necessary to respond to emergency episodes that may occur at the facility.

The requirements of this finding are satisfied as discussed under the similar finding for the SYU Change of Operator in Finding 2.1.3 (8). The Emergency Response Plan drill for the POPCO Gas Plant is incorporated into the emergency drill for the SYU.

(9) Operator Capability. The proposed operator has the skills and training necessary to operate the permitted facility in compliance with the permit and all applicable county codes and has a good working knowledge of the crucial compliance plans listed in Sec. 25B-10.1.f. The director shall require relevant records of compliance, and corrective actions taken subsequent to any major incidents for facilities, if any, that are similar in nature to those that are the subject of the permit, as may be necessary to make findings. These records shall be used to provide sufficient assurance that the proposed operator does not reflect a record of non-compliant or unsafe operations systemic in nature for similar facilities to those being considered for operatorship.

The requirements of this finding are satisfied as discussed under the similar finding for the Santa Ynez Unit Change of Operator in Finding 2.1.3 (9). Operator capabilities for the POPCO Gas Plant are the same as for the Santa Ynez Unit. As described in the Planning Commission Staff Report dated October 22, 2024, approximately 64 percent of the onsite facility employees for the Santa Ynez Unit facilities and POPCO Gas Plant have transferred over in their same or similar capacity from ExxonMobil. These years of industry experience and high employee transfer rate demonstrates that Sable has the skills and training necessary to operate the permitted facility in compliance with the permit and all applicable county codes. All employees and management have been trained on the facility-specific Compliance Plans, demonstrating that employees have a good working knowledge of the facility's crucial compliance plans. Sable has had zero major incidents involving crude oil and gas facilities within the U.S. while managing

Sable Permian Resources from 2017 – 2021, FMOG from 2013 – 2017, and PXP from 2009 – 2013.

2.3 CHANGE OF OPERATOR AND GUARANTOR FOR THE LAS FLORES PIPELINE SYSTEM, FINAL DEVELOPMENT PLAN PERMIT NO. 88-DPF-033 (RV01)z, 88-CP-60 (RV01)(88-DPF-25cz;85-DP-66cz; 83-DP-25cz)

2.3.1 Findings required for Change of Guarantor

In compliance with Section 25B-9(e) of the County Code, prior to the approval of an application for a change of guarantor, the director shall make the following findings:

- (1) Financial Guarantees. The proposed guarantor has provided all necessary instruments or methods of financial responsibility approved by the county and necessary to comply with the permit and any county ordinance.*

The requirements of this finding are satisfied. No current County-required bonds are in place for the Las Flores Pipeline System that require updates to reflect the new Guarantor. Previously required bonds under the Final Development Permit were limited to permit conditions relating to habitat restoration from the construction of the pipelines, and have been satisfied and released to the former Guarantor. Neither the Final Development Plan Permit nor County ordinance requires the permittee to submit other bonds, with the exception of a final abandonment decommissioning bond outlined in Condition O-1. At the time of final abandonment, the County will direct the permittee to post a decommissioning bond, or will direct the permittee to continue to pay property taxes until final abandonment and site restoration is complete. A decommissioning bond is not yet required to be submitted to the County as the facility has not been permanently shut-down.

2.3.2 Findings required for Change of Operator

In compliance with Section 25B-10 of the County Code, the planning commission shall approve an application for change of operator only if the planning commission makes the following findings.

- (1) Fees and Exactions. All outstanding county required fees and exactions due for the facility have been paid.*

The requirements of this finding are satisfied. Planning and Development has verified with Accounting staff that no outstanding payments are due for the pipeline system, or related planning and compliance cases.

(2) Financial Guarantees. All necessary insurance, bonds or other instruments or methods of financial responsibility approved by the county and necessary to comply with the permit and any county ordinance have been updated, if necessary, to reflect the new operator and will remain in full effect following the operator change.

The requirements of this finding are satisfied, as discussed under the similar finding for Change of Guarantor in Finding 2.3.1 (1).

(3) Acceptance of Permit. The proposed operator has provided a letter from a responsible official representing the proposed operator formally accepting all conditions and requirements of the permit.

The requirements of this finding are satisfied. Sable provided a signed Agreement to Comply with Conditions of Approval dated March 14, 2024 accepting all conditions and requirements of the permit. The Agreement was recorded by the County Clerk-Recorder's office on September 13, 2024 as an official record. The Agreement is provided in Attachment D of the Planning Commission Staff Report dated October 22, 2024, and is included herein by reference.

(4) Facility Safety Audit. The current owner or operator has provided a copy of the most recent county-conducted comprehensive safety audit of the physical facility, along with a description of the status of implementing its recommendations, to the proposed new operator. A safety inspection maintenance and quality assurance plan audit approved by the appropriate county official shall satisfy this requirement.

The requirements of this finding are satisfied. Currently, there are no County-conducted safety audits of the Las Flores Pipeline System available, as the 1988 settlement agreement between the County and Celeron Pipeline Company/Getty Trading and Transportation Company determined that the County does not have the jurisdiction to regulate any aspect of the design, construction, or operation of the pipeline which was already covered under the Code of Federal Regulations, Title 49 Part 195 (*Transportation of Hazardous Liquids by Pipeline*). The Code of Federal Regulations requires that pipeline operators implement both internal and external audits. External safety audits for the Las Flores Pipeline System are conducted by the Pipeline and Hazardous Materials Safety Administration and the Office of the State Fire Marshal. The current owner, Pacific Pipeline Company has satisfied the County's requirement to provide the most recent audit information to Sable, including state and federal audit data from at least 2018 through 2023. A summary of audit data submitted to the County

in March of 2024 is presented in section 6.2.3, Table 3.1 of the Planning Commission Staff Report dated October 22, 2024, and is included by reference herein.

(5) Compliance with Existing Requirements. As of the date that the application is deemed complete, the current operator is in compliance with all requirements of the permit, including any requirements of a county-required safety audit, any notice of violation, and any county ordinance, or the owner and proposed operator have entered into a written agreement with the director that specifies an enforceable schedule to come into compliance with such requirements.

The requirements of this finding are satisfied. The current operator is in compliance with all requirements of the County Permit and County ordinances as of the date the application was deemed complete on July 30, 2024. Records of the most-recent state and federal safety audits were provided to the new owner, as described in Finding 2.3.2 (4) above. No County notice of violation had been issued for the facility at the time the applications were determined to be complete on July 30, 2024. No County permit compliance issues, or corrective actions that would require a written agreement with the Director were present at the time the applications were determined to be complete on July 30, 2024.

(6) Compliance Plans. The current owner and proposed operator have updated, where applicable, any existing, approved safety inspection maintenance and quality assurance program, emergency response plan, fire protection plan, and oil spill contingency plan, or equivalent approved plans, with current emergency contact information pertaining to the new operator. The current owner and proposed operator have agreed in writing to revise all other plans required by the permit or any county ordinance, as necessary to reflect the change of operator, and to do so with sufficient diligence to obtain approval of the revised plans by the appropriate county official within six months after assuming operations.

The requirements of this finding are satisfied. All existing and approved safety inspection maintenance and quality assurance program, emergency response plan, fire protection plan, and oil spill contingency plan, or equivalent approved plans have been updated with the current emergency contact information pertaining to Sable. Secondary compliance plans required by the Final Development Plan permit have also been updated with the current emergency contact information pertaining to Sable. Compliance Plans subject to this finding include the following, and are outlined in Table 3.2 of the Planning Commission Staff Report dated October 22, 2024, and are included as Attachment F to the Planning Commission Staff Report dated October 22, 2024, and are incorporated by reference herein.

Plan Name	Las Flores Pipeline Final Development Plan Permit Condition
Integrated Contingency Plan	G-1, P-3, P-5, P-9, P-14
Noise Monitoring Plan	N-1
Pump Station Fire Protection Plan	P-9
SIMQAP	P-2
Site Security Plan	P-6

(7) Transitional Plan. The current owner or operator and proposed operator have submitted a transitional plan that will demonstrate the proposed operator shall receive adequate training, including by means of cross training by the current operator, where feasible, and shall have a good working knowledge of the crucial compliance plans listed in Sec. 25B-10.1.f before assuming control of operations. The plan has been approved by the director. The planning commission may exempt the current owner and proposed operator from this requirement, or portions thereof, for good cause.

The requirements of this finding are satisfied. Sable submitted a comprehensive Transition Plan describing the background of the pipeline system, the general approach to the transition, details on staffing, and asset-specific training and general training conducted. Pacific Pipeline Company remains the legal owner of the pipeline system with Sable as operator. To demonstrate a good working knowledge of the crucial compliance plans listed in County Code Chapter 25B-10.1.f, and listed above in Finding 2.3.2 (6), Compliance Plans were approved by Sable’s senior staff and leadership employees, and were received and reviewed by Sable’s field employees based on the applicability of each plan to the particular employee’s responsibilities. Emergency Response-related plans were distributed to all staff and are routinely reviewed during safety meetings and scheduled emergency drills (see Finding 2.3.2 [8] below). The Transition Plan, with a signed statement confirming the operator’s adequate training and working knowledge of the pipeline’s compliance plans, is included as Attachment E-2 to the Planning Commission Staff Report dated October 22, 2024 and is incorporated by reference herein.

(8) Emergency Response Plan Drills. The proposed operator has adequately performed one or more county approved emergency response plan drills necessary to respond to emergency episodes that may occur at the facility.

The requirements of this finding are satisfied. Sable submitted an updated Incident Contingency Plan as part of their application materials, which combines the previously separate Emergency Response, Fire Protection, and Oil Spill Contingency Plans. Sable held a comprehensive emergency response training exercise and emergency response drill on July 25, 2024 with the County Fire Department's Office of Emergency Management, and other regulatory agencies. The Fire Department confirmed that the emergency response drill was completed in accordance with County requirements, and that no outstanding issues were identified.

(9) Operator Capability. The proposed operator has the skills and training necessary to operate the permitted facility in compliance with the permit and all applicable county codes and has a good working knowledge of the crucial compliance plans listed in Sec. 25B-10.1.f. The director shall require relevant records of compliance, and corrective actions taken subsequent to any major incidents for facilities, if any, that are similar in nature to those that are the subject of the permit, as may be necessary to make findings. These records shall be used to provide sufficient assurance that the proposed operator does not reflect a record of non-compliant or unsafe operations systemic in nature for similar facilities to those being considered for operatorship.

The requirements of this finding are satisfied. As described in the Planning Commission Staff Report dated October 22, 2024 and included herein by reference, Sable was formed in October 2020 as an independent oil and gas company headquartered in Houston Texas as a special purpose acquisition company. Sable's Executive Management Team have managed oil and gas exploration and production businesses in the Pacific Ocean, the Gulf of Mexico, and onshore California for more than 30 years. Specific to Santa Barbara County, the Executive Management Team has successfully operated Platform Irene and the associated Lompoc Oil & Gas Plant and Point Pedernales Pipelines, and Platforms Harvest, Hidalgo, Hermosa and the associated Gaviota Oil & Gas Plant and Point Arguello Pipelines under former management of Plains Exploration and Production Company and Freeport-McMoRan Oil and Gas. The Las Flores Pipeline System has five full-time employees in addition to contracted personnel and specialists who have extensive experience with both onshore and offshore pipelines. The combined years of experience of the pipeline operating team is 23 years, with many years of experience directly operating in Santa Barbara County. All management staff and employees have been trained on the facility-specific Compliance Plans. Sable has had zero major incidents involving crude oil and gas pipelines within the U.S. while managing Sable Permian Resources from 2017 – 2021, Freeport-McMoRan Oil and Gas from 2013 – 2017, and Plains Exploration and Production Company from 2009 – 2013. These years of industry experience with no major incidents demonstrates that Sable has the skills and training necessary to operate the pipeline system in compliance with the County permit and all applicable County codes. All

employees and management staff have been trained on the pipeline-specific Compliance Plans, as described in Findings 2.3.2 (6) and 2.3.2 (7) above, demonstrating that employees have a good working knowledge of the pipeline's crucial compliance plans.