

Katherine Douglas

Appellant Presentation - CBD

3

LATE
DIST

From: Rachel Mathews <rmathews@biologicaldiversity.org>
Sent: Friday, October 31, 2025 10:16 AM
To: Katherine Douglas; sbcob
Cc: Julie Teel Simmonds; Lia Graham
Subject: Re: Slides for presentation in support of appeal - SYU permit transfers
Attachments: 2025-11-04_CBD SB BOS Presentation_Permit Transfer Appeal_Updated.pptx

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Good morning,

My apologies, but I'd like to withdraw the slides I submitted yesterday—the attached updated slides are the ones that I would like to use.

Thank you, and sorry for the inconvenience.

Sincerely,

Rachel Mathews | she/her
Senior Attorney, Oceans Program
Center for Biological Diversity
703-489-7902 (c) | 828-774-5636 (o)
rmathews@biologicaldiversity.org

From: Katherine Douglas <kdoug@countyofsb.org>
Sent: Thursday, October 30, 2025 7:40 PM
To: Rachel Mathews <rmathews@biologicaldiversity.org>
Cc: Julie Teel Simmonds <jteelsimmonds@biologicaldiversity.org>; Lia Graham <lgraham@countyofsb.org>
Subject: RE: Slides for presentation in support of appeal - SYU permit transfers

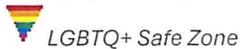
Good afternoon Rachel,

I am confirming timely receipt. Thank you very much.

Respectfully,

Katherine Douglas
Pronouns: She/Her/Hers
Clerk of the Board of Supervisors
County of Santa Barbara

105 E. Anapamu Street, Suite 407
Santa Barbara, CA 93101
Direct: 805.568.2240
Fax: 805.568.2249
kdoug@countyofsb.org



From: Rachel Mathews <rmathews@biologicaldiversity.org>
Sent: Thursday, October 30, 2025 4:22 PM
To: Lia Graham <lgraham@countyofsb.org>; sbcob <sbcob@countyofsb.org>
Cc: Julie Teel Simmonds <jteelsimmonds@biologicaldiversity.org>
Subject: Slides for presentation in support of appeal - SYU permit transfers

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Thank you, Ms. Graham. Attached are the slides that I will use in my presentation for the Center for Biological Diversity and Wishtoyo Foundation.

Sincerely,

Rachel Mathews | she/her

Senior Attorney, Oceans Program

Center for Biological Diversity

703-489-7902 (c) | 828-774-5636 (o)

rmathews@biologicaldiversity.org

From: Lia Graham <lgraham@countyofsb.org>
Sent: Thursday, October 30, 2025 4:18 PM
To: srusch@sableoffshore.com <srusch@sableoffshore.com>;
Jessica.StebbinsBina@lw.com <Jessica.StebbinsBina@lw.com>; lkaplan@omm.com <lkaplan@omm.com>;
aduenner@sableoffshore.com <aduenner@sableoffshore.com>;
cflores@sableoffshore.com <cflores@sableoffshore.com>; DJ.Moore@lw.com <DJ.Moore@lw.com>; Rachel
Mathews <rmathews@biologicaldiversity.org>;

lkrop@environmentaldefensecenter.org <lkrop@environmentaldefensecenter.org>;
tregifo@environmentaldefensecenter.org <tregifo@environmentaldefensecenter.org>; Briggs, Errin
<ebriggs@countyofsb.org>; Wilson, Jeffrey <jewilson@countyofsb.org>; Plowman, Lisa
<lplowman@countyofsb.org>

Subject: Hearing Time Estimate Board of Supervisor's November 4, 2025 - Sable

Good afternoon,

Please see the attached Agenda for the November 4, 2025 Santa Barbara County Board of Supervisors meeting. The Appeal of the Sable Offshore Corporation's Change of Owner, Operator, and Guarantor of the Santa Ynez Unit, POPCO Gas Plant, and Las Flores Pipeline System Final Development Plan Permits is scheduled as Departmental Item No. 3 (see page 18 of the attached Agenda) and is estimated to begin at approximately [11:10 AM]. A summary of the time allocated for this item is also attached to this email.

Lastly, as a friendly reminder, any documents longer than one page - including applicant and appellant presentations - must be submitted to the Clerk of the Board by 12:00 PM on the Friday prior to the Board hearing. Per Board Resolution No. 91-333, the Board shall not consider or accept an untimely submission as part of the record, unless a motion to do so is passed by a four-fifths vote.

Please submit all documents, including presentations, to the Clerk of the Board at: sbcob@countyofsb.org.

If you have any questions or need further assistance, feel free to reach out.

Thank you,



Lia Marie Graham

Deputy Clerk of the Board/Assessment Appeals Clerk

County Executive Office – Clerk of the Board of Supervisors

105 E. Anapamu Street, Ste. 407, Santa Barbara, CA 93101

Phone: 805-568-2247 | Email: Ligraham@countyofsb.org

Website: www.countyofsb.org

Sign up for news and announcements from the County at www.countyofsb.org.

Presentation of Center for Biological Diversity & Wishtoyo Foundation

Rachel Mathews

November 4, 2025

Pipeline Work, October 2024

Source: Tevin Schmitt/Wishtoyo Foundation & Ventura Coastkeeper



In the future:

“The current owner or operator . . . of a facility subject to this chapter shall be responsible for the proper abandonment of the facility.”

County Code § 25B-4(i)(1).



“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.”

County Code § 25B-10(a)(2).



Information “needed . . . to make the financial guarantees” includes “the previous year's annual report, audited financial statements, and required SEC filings.”

County Code § 25B-6(f)(2)(d).



The Board “may impose additional conditions on the permit” to ensure that any “financial guarantees that were submitted to and relied on by the planning commission as a basis to make any finding required by this chapter are maintained.”

County Code § 25B-10(b).

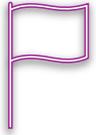
Sable has not posted a decommissioning bond.

POPCO FDP: Permittee “shall post a performance bond, or other security device acceptable to County Counsel, in an amount determined by the County.” (Q-2)

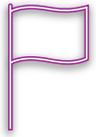
SYU FDP: Permittee “shall post a performance bond or other security device acceptable to County Counsel to ensure compliance, or continue to pay property taxes as assessed during project operation until site restoration is complete, **as determined by the County.**” (XIX-1)

Las Flores Pipeline System FDP: Permittee “shall post a performance bond to insure compliance, or continue to pay property taxes as assessed during project operation until site restoration is complete, **as determined by the County.**” (O-1)

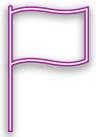
What we know:



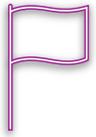
New company trying to restart post-failure pipeline



History of non-compliance



\$875 million in debt to Exxon



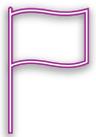
“Substantial doubt” about Sable’s “ability to continue as a going concern”



Cost to decommission federal facilities:
\$471 million (2020 estimate)



CalGEM demanding \$31.9 million bond
(processing facility)



Predecessors fight and delay clean up

What we don't have:



Estimated cost of decommissioning the pipelines



Proof of compliance with other state and federal bonding requirements



The Board cannot find that Sable has provided the financial guarantees necessary to secure its decommissioning obligations.