

Memorandum



Date: February 25, 2025

From: Jacquelyne Alexander, Chief Deputy Clerk of the Board

Subject: Departmental Item No. 1 (File No. 25-00144) regarding the Planning Commission Approval of the Sable Offshore Corporation's Change of Owner, Operator, and Guarantor - Public Comment Not Accepted Into the Record

At the meeting of Tuesday, February 25, 2025, a motion was made by Supervisor Lavagnino, seconded by Supervisor Nelson, that this matter be acted on as follows:

To accept the following documents into the record: Public Comment letter from Evie Lynn, Public Comment letter from Janice Rudestam, Public Comment letter from Karen Dorfman, Public Comment letter from Rachel Rhodes, Presentation Replacement No. 1 Applicant/Sable, Public Comment Letter from Lauren French, Public Comment Support Letters from FionaHutton&Associates on behalf of Sable/Applicant, Public Comment letter from Heal the Ocean, Public Comment letter from Linda Stewart-Oaten, Public Comment letter from Laura Haston, Public Comment letter from Kaytee Dobbs and a Public Comment letter from David Hourin.

The motion failed by the following vote:

Ayes: 2 - Supervisor Nelson, and Supervisor Lavagnino

Noes: 2 - Supervisor Lee, and Supervisor Capps

Recused: 1 - Supervisor Hartmann

As the motion to accept the late-submitted documents did not pass, the documents outlined in **Attachment A** of this memo were not incorporated into the official record or taken into consideration.

Attachment A: Departmental Item No. 1 (File No. 25-00144) List of Late-Submitted Documents

Attachment A

Public Comment List for the Meeting of February 25, 2025: Consider recommendations regarding appeals of the County Planning Commission approval of the Sable Offshore Corporation’s Change of Owner, Operator, and Guarantor for the Santa Ynez Unit, Pacific Offshore Pipeline Company Gas Plant, and Las Flores Pipeline System Final Development Plan Permits, Third, Fourth, and First Districts (*Land Use Appeal public comment received after noon the Friday prior to the hearing*)

Type of Document	Received From	Received On
Public Comment	Evie Lynn	February 21 at 5:18pm
Public Comment	Janice Rudestam	February 24 at 8:55am
Public Comment	Karen Dorfman	February 24 at 9:51am
Public Comment	Rachel Rhodes	February 24 at 11:52am
Presentation Replacement No. 1	Applicant/Sable	February 24 at 12:01pm
Public Comment	Lauren French	February 24 at 12:27pm
Public Comment Support Letters	FionaHutton&Associates on behalf of Sable/Applicant	February 24 at 1:16pm
Public Comment	Heal the Ocean	February 24 at 1:26pm
Public Comment	Linda Stewart-Oaten	February 24 at 1:41pm
Public Comment	Laura Haston	February 24 at 2:16pm
Public Comment	Kaytee Dobbs	February 24 at 2:17pm
Public Comment	David Hourin	February 24 at 4:50pm

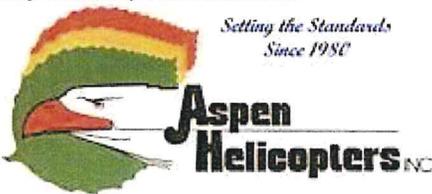
Katherine Douglas

From: Evie Lynn <elynn@aspenhelo.com>
Sent: Friday, February 21, 2025 5:18 PM
To: sbcob
Subject: Comment letter for Tuesday 25 February 2025 meeting
Attachments: E. Lynn Sable letter Feb 2025.pdf

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Good Afternoon,
Attached is my letter of comment for the Sable hearing on Tuesday 25 February 2025.
Please let me know if you need anything else.
Sincerely,
Evie

Evie Lynn
Vice President, Operations
805-985-5416 Office
504-606-6924 Cell
805-985-7327 Fax
elynn@aspenhelo.com





Aspen Helicopters
2899 West 5th Street
Oxnard, CA 93030
Phone: (805) 985-5416
Email: elynn@AspenHelo.com

Santa Barbara County Board of Supervisors
105 East Anapamu Street
Santa Barbara CA 93101

February 21, 2025

Dear Santa Barbara County Board of Supervisors,

I am the Vice President, Director of Operations and a helicopter pilot at Aspen Helicopters, Inc. located in Oxnard, California. Prior to my job with Aspen Helicopters, I served on active duty as a member of the-U.S. Coast Guard (USCG) for 24 years, flying helicopters and supporting the USCG'S statutory missions. While flying for the USCG I spent eight years flying amongst the oil and gas industry in the Gulf of Mexico and have conducted hundreds of flight operations, to include landings, on various offshore production facilities.

I come before the Planning Commission to share my experience with Sable. During the past 20 months I have conducted multiple flight operations with Sable to the three offshore facilities, Hondo, Harmony and Heritage. Through my observations I have seen Sable's team take a proactive safety approach, always evaluating the condition of the platforms, valuing feedback from the team and making improvements. For example, during initial flight operations to one of the platforms the team noted large tanks located on the south end of the helicopter approach path to land which reduced the available flight path options to and from the helipad. Sable had the tanks relocated to a completely different section of the platform thereby reducing risk involved with flight operations.

Throughout the course of my career I have encountered all manner of helipads in various states of size, cleanliness and general functionality. Hondo, Harmony and Heritage are some of the best helipads I have ever landed on; they are always clean, clearly marked, large landing areas and I have never internally questioned if Hondo, Harmony or Heritage would actually hold a helicopter that weighs 11,900 pounds.

In my role at Aspen I have the opportunity to not only fly the Sable team but to also assign other pilots to fly with Sable. As part of normal post flight communications pilots relay feedback to me regarding the event. Sable has always been a positive customer for the Aspen team to fly. Not only has Sable sought input from me regarding the safety of flight operations, they also speak with each pilot that has flown their team seeking feedback as part of the continuous improvement safety mindset Sable maintains. Sable acts on this feedback and Aspen has witnessed the positive results of Sable's open and transparent approach to safe operations.

The most important aspect of Aspen's interaction with Sable is that Sable doesn't pressure a pilot who delays or declines a flight for safety reasons. The fact that Sable doesn't pressure the pilot to fly indicates Sable's willingness to prioritize safety over production in their operation.



Aspen Helicopters
2899 West 5th Street
Oxnard, CA 93030
Phone: (805) 985-5416
Email: elynn@AspenHelo.com

Sable will be an excellent steward of this operation given the attention to detail and responsiveness demonstrated during Aspen's interactions with Sable's team.

Sincerely,


Digitally signed by Evie Lynn
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Date: 2025.02.21 17:15:24
+08'00'

Evie Lynn

Katherine Douglas

From: JanR <drjansb@gmail.com>
Sent: Monday, February 24, 2025 8:55 AM
To: sbcob
Subject: Sable application for pipeline

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I am begging the Board of Supervisors to say "no" to Sable. I know there is a lot of pressure to agree to the transfer of permits to opening the pipeline, oil platforms and gas plants. I understand that employment opportunities are important to our community. If Sable were to install a new pipeline, I would be less concerned.

The current pipeline is corroded and needs to be replaced or upgraded to be considered safe. There is no indication that Sable intends to replace and upgrade the pipeline, nor that they have the funds to do so.

The Refugio spill was a terrible disaster for our community and for other communities further south. We were not able to use the Gaviota beaches. Local wildlife suffered and died. Community members took it upon ourselves to try to clean the beach and care for seabirds and animals. Please let's not have to do that again!

Another spill would be devastating to Santa Barbara County and the Gaviota Coast. So please think carefully about how

important your vote is, and vote NO on making Sable responsible for the health of our beaches and our community.

Thank you.

Janice Rudestam

3924 Foothill Rd.

Santa Barbara CA

Janice Rudestam, Ph.D.

www.drjanrudestam.com

Katherine Douglas

From: Karen Dorfman <karen.dorfman@icloud.com>
Sent: Monday, February 24, 2025 9:51 AM
To: sbcob
Subject: No Sable Transfer

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I was there. The 2015 oil spill was terrible. We need to stop this endless cycle of spill, forget, restart.



The Board of Supervisors should deny Sable's application to transfer permits for the Santa Ynez Unit, POPCO Gas Plant, and Las Flores Pipelines.

Another spill from these facilities is likely and would be devastating to Santa Barbara County and the Gaviota Coast.

Sable likely cannot afford to cover the cost of remediation if/when another major spill occurs. The public should not have to pay to clean up another spill.

It is possible that Sable never restarts these facilities, forcing it into bankruptcy. Sable has not provided any assurances that it will be able to pay to decommission its facilities in that scenario.

The Board cannot approve the transfer of permits from Exxon to Sable because Sable has not met the conditions of the permits. For example, the pipeline does not have the critical corrosion protection technology required by the permits.

Sable has received notices of violations from three state agencies and recently received a second cease-and-desist order from the California Coastal Commission for continuing work on its facilities without a proper permit. The questionable behavior of Sable's management team shows that the Board cannot trust them to responsibly operate this project.

Thank you,
Karen Dorfman
Goleta

Katherine Douglas

From: Rachel Rhodes <rachrhodes@gmail.com>
Sent: Monday, February 24, 2025 11:52 AM
To: sbcob
Subject: Public Comment re: transfer of permits from Exxon Mobil to Sable
Attachments: Rhodes_public_comment.pdf

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.

To whom it may concern,

Please find attached my public comment for the upcoming Santa Barbara County Board of Supervisors meeting on February 25 in regards to the transfer of permits from Exxon Mobil to Sable. I strongly urge the Board of Supervisors to deny Sable's application to transfer these permits and to require a proper, thorough environmental review and public engagement process. We need sustainable energy solutions that protect our environment, not backward steps that threaten it.

Full public comment letter attached below.

Thank you!
Rachel

February 24, 2025

Board of Supervisors,
County of Santa Barbara,
Santa Barbara, CA

RE: Opposition to Transfer of Pipeline Permits from Exxon Mobil to Sable Offshore

Dear Board of Supervisors of the County of Santa Barbara,

I am writing to express my strong opposition to the transfer of pipeline permits from Exxon Mobil to Sable Offshore. As a marine scientist at UCSB working on whale conservation, a lifelong surfer, and someone who grew up in Carpinteria, I have a deep personal and professional connection to the waters and coastline that would be threatened by this decision.

Growing up here, I was raised on stories and haunting images of the devastating 1969 Santa Barbara oil spill that released 4.2 million gallons of crude oil into the Channel. I had believed our long and tragic history with oil disasters was firmly behind us—until the 2015 Plains All American pipeline spill shattered that hope. Watching wildlife die and our beaches close felt like a heartbreaking step backward for our community and marine ecosystems. I now fear another spill from these facilities is not just possible but likely—with equally devastating consequences for the coastline I deeply cherish.

Sable's troubling track record includes violation notices from three state agencies and multiple cease-and-desist orders, raising serious doubts about their management. Their questionable financial capacity provides no assurance they could afford cleanup costs from another spill—potentially leaving taxpayers responsible—or properly decommission facilities if they declare bankruptcy.

The Santa Barbara Channel is home to vital marine ecosystems, including critical habitat for the endangered blue, fin, and humpback whales that are the focus of my research at UCSB. A spill would have catastrophic consequences for the entire marine food web and our coastal communities. Additionally, if operations restart, it would increase oil production in California and dramatically change Santa Barbara County's greenhouse gas emissions—a dramatic step backward in our climate commitments.

I strongly urge the Board of Supervisors to deny Sable's application to transfer these permits and to require a proper, thorough environmental review and public engagement process. We need sustainable energy solutions that protect our environment, not backward steps that threaten it.

Thank you for your consideration and for your service to our community.

Sincerely,

Rachel Rhodes
Marine Scientist, UCSB

Katherine Douglas

Applicant Presentation Replacement No. 1

1



From: Jessica.StebbinsBina@lw.com
Sent: Monday, February 24, 2025 12:01 PM
To: sbcob
Cc: srusch@sableoffshore.com; DJ.Moore@lw.com; Jessica.StebbinsBina@lw.com
Subject: Updated Sable Offshore Corp. Presentation
Attachments: Sable Board Presentation Updated.pdf

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,

Please find attached an updated version of Applicants' Sable Offshore Corp., Pacific Pipeline Company, and Pacific Offshore Pipeline Company updated presentation to the Board of Supervisors in connection with the February 25, 2025, Hearing regarding the Application for Change of Owner, Guarantor, and Operator for the Las Flores Pipeline System Lines CA-324 and CA-325 A/B; Application for Change of Owner, Guarantor, and Operator for the POPCO Facilities; and Application for Change of Owner, Guarantor, and Operator for the Santa Ynez Unit, as well as Applicants' planned presentation to the Board at the hearing. The Applicants would like to use the attached presentation in lieu of the version that was sent on Friday.

We would appreciate your confirming receipt. We will deliver a hard copy this afternoon.

Please don't hesitate to reach out with any questions.

Best,

Jessica Stebbins Bina

LATHAM & WATKINS LLP
10250 Constellation Blvd. Suite 1100
Los Angeles, CA 90067
Direct Dial: +1.424.653.5525
Email: jessica.stebbinsbina@lw.com
<https://www.lw.com>

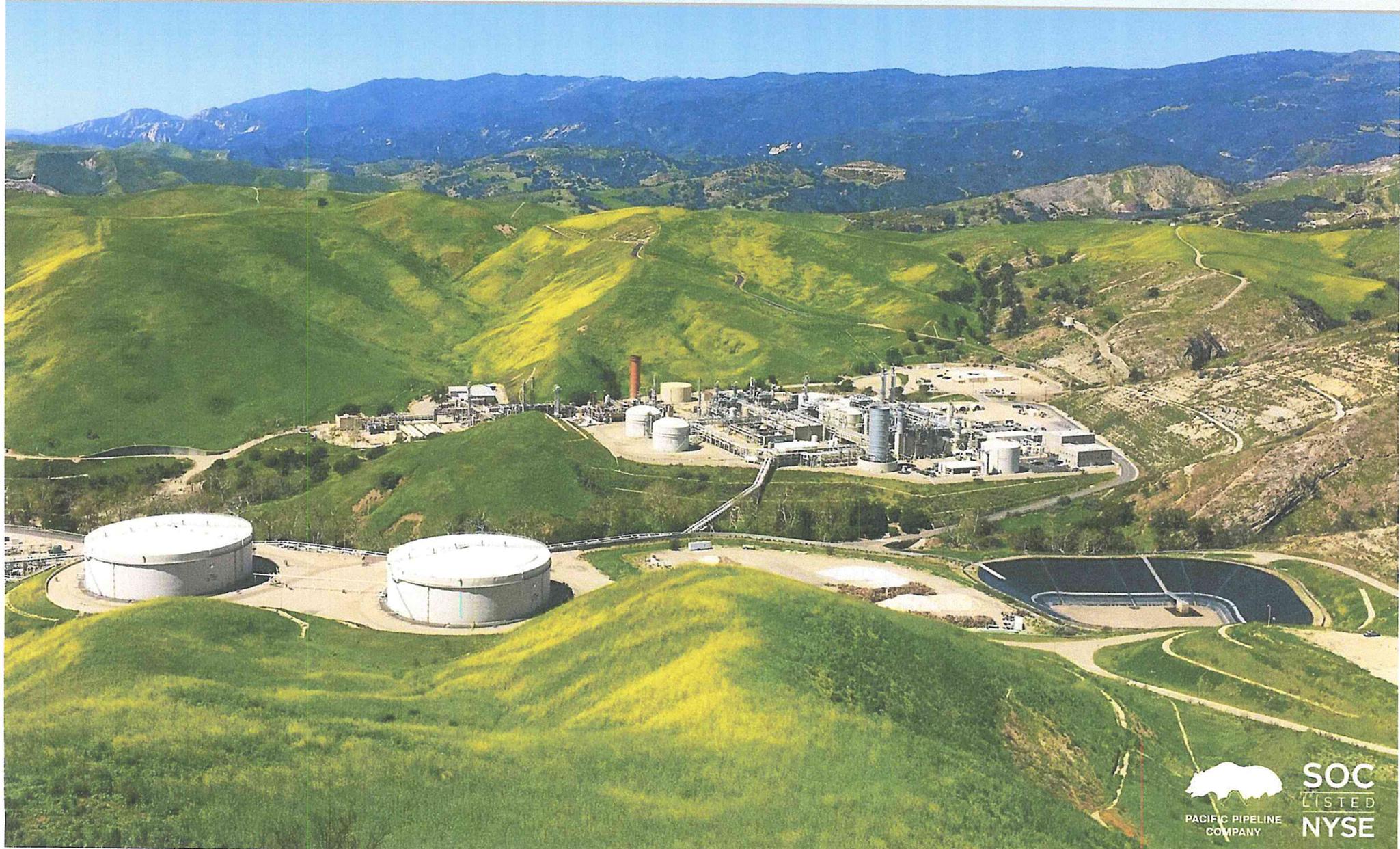
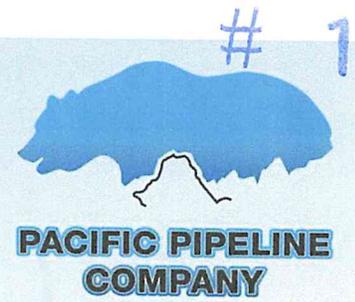
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Sable Offshore Corp.

Application for Change of Owner, Operator
and Guarantor

SABLE
OFFSHORE



SOC
LISTED
NYSE

Overview

- Three facilities:
 - Santa Ynez Unit – change of owner, operator, and guarantor from ExxonMobil to Sable
 - Pacific Offshore Pipeline Company Gas Plant – change of operator and guarantor from ExxonMobil to Sable
 - Las Flores Pipeline System – change of operator and guarantor from ExxonMobil to Sable
- Santa Barbara County Code Section 25B provides for transfer of county permits upon satisfaction of specified criteria
 - “Upon making the findings...the planning commission **shall approve** the change” of owner, operator, and guarantor.
- All findings required under Section 25B are satisfied
- Consistent with requirements, the Planning Commission approved permit transfers on October 30, 2024
 - Planning Commission’s detailed findings outline compliance
 - County staff recommends denial of the appeals, as detailed in recommendation letter

Chapter 25B is Narrow and Approval Is Mandatory

- Chapter 25B provides for *transfer of county permits* upon satisfaction of specified criteria
- Permit transfer is required upon sale of assets to put County in direct relationship with owner, operator, and guarantor
- Chapter 25B only approves permit transfer; it does not authorize pipeline restart
- This Board *already rejected Appellants' arguments* when it approved ExxonMobil's similar application in 2023:
 - Transfer of the permits is not a project under CEQA
 - FDPs remain in effect and there is no basis to require new permits or EIR
 - Nothing from Plains' 2015 spill prevents permit transfer
 - Not inactivity of pipeline since 2015
 - Not alleged failure of cathodic protection
 - Not Plains' alleged failure to comply with county permits
- There is no lawful basis to revisit any of these determinations
- Approval is mandatory when conditions are met, as they are here

All Chapter 25B Findings Are Met

Sable Offshore Corp.
Pacific Offshore Pipeline Company
Pacific Pipeline Company

Sable Offshore Corp.

Sable Offshore Corp.

Owner

Fees and Exactions	✓
Financial Guarantees	✓
Acceptance of Permits	✓
Facility Safety Audit	✓
Compliance with Existing Requirements	✓

Operator

Fees and Exactions	✓
Financial Guarantees	✓
Acceptance of Permits	✓
Facility Safety Audit	✓
Compliance with Existing Requirements	✓
Compliance Plans	✓
Transitional Plan	✓
Emergency Response Plan Drills	✓
Operator Capability	✓

Guarantor

Financial Guarantees	✓
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Planning Commission Confirmed Findings Are Met

- Fees and Exactions (Sec. 25B-9(a); 25B-10(a)(1).)
 - “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.” (Findings, pp. 1, 3, 5, 9 [emphasis added].)
- Acceptance of Permit (Sec. 25B-9(a)(3); 25b-10(a)(3).)
 - “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.” (Findings, pp. 2, 4, 7, 10 [emphasis added].)
- Safety Audit (Sec. 25B-10(a)(4).)
 - “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 (SSRRC).” (Findings, p. 2.)
- Compliance with Existing Permit Requirements (Sec. 25B-9(a)(5), 25B-10(a)(5).)
 - “The requirements of this finding are satisfied. The permittee is in compliance with all requirements of the FDP Permit. No [County] notice of violations have been issued for the facility.” (Findings, pp. 3, 8 [emphasis added].)

Sable Exceeds Financial Requirements

“The requirements of this finding are satisfied. Previously required bonds and endowments under the FDP Permit have been satisfied and none remain outstanding. The FDP Permit Condition No. XXX-1 requires the permittee to be responsible for the proper abandonment of the facility, and that a performance bond be in place, or that the permittee continue to pay property taxes until abandonment is complete. As no bond is in place, the permittee will continue to pay property taxes until site restoration is complete.” (Findings, pp. 2, 4, 6-7, 9-10.)

- Santa Barbara County Sections 25B-9 and 25B-10 do not require bonds for the Change of Owner, Operator and Guarantor
- FDP requires payment of property taxes
 - As of November 18, 2024, Sable had **\$363 million** in unrestricted cash
 - Sable has a current market capitalization exceeding **\$2.6 billion**

Sable carries extensive insurance:

- More than **\$400 million** in liability coverage (incidents and spills)
- Additional **\$35 million** in Oil Spill Financial Responsibility policy that will significantly increase at restart
- **\$2.5 billion** in property insurance covering SYU, the POPCO Gas Plant and the Las Flores Pipeline System

Sable Exceeds Financial Requirements

Though not required here, Sable/PPC submitted Certificates of Financial Responsibility (Certificate Nos. 22624-00-001, 42624-00-001 and 22623-00-001), which confirm consistency with state financial responsibility requirements.

OIL SPILL PREVENTION AND RESPONSE

DISPATCH REPORT

INLAND FACILITY, EVIDENCE OF CERTIFICATE OF RESPONSIBILITY

By Applicant Name

<i>App. #</i>	<i>Applicant Name</i>	<i>Facility Name</i>	<i>Cert. #</i>	<i>Cert. Exp.</i>	<i>Evidence Type</i>	<i>Evidence Expires</i>			<i>Fin. Resp. Demon</i>
						<i>1</i>	<i>2</i>	<i>3</i>	
2624	PACIFIC PIPELINE COMPANY	LAS FLORES PIPELINE SYSTEM	42624-00-001	08/31/2026	01	08/14/2025			\$101,000,000

OIL SPILL PREVENTION AND RESPONSE

DISPATCH REPORT

MARINE FACILITY, EVIDENCE OF CERTIFICATE OF RESPONSIBILITY

By Applicant Name

<i>App. #</i>	<i>Applicant Name</i>	<i>Facility Name</i>	<i>Cert. #</i>	<i>Cert. Exp.</i>	<i>Evidence Type</i>	<i>Evidence Expires</i>			<i>Fin. Resp. Demon</i>	<i>MTU Fin. Resp. Demon.</i>
						<i>1</i>	<i>2</i>	<i>3</i>		
2624	PACIFIC PIPELINE COMPANY	CA-324- LAS FLORES PIPELINE (LAS FLORES CANYON TO GAVIOTA)	22624-00-001	08/31/2026	01	08/14/2025			\$101,000,000	
2623	SABLE OFFSHORE CORP.	CRUDE OIL & WATER EMULSION PIPELINE - PORTION IN STATE WATERS FROM	22623-00-001	08/31/2026	01	08/14/2025			\$101,000,000	



Compliance and Transition Plans Were Updated

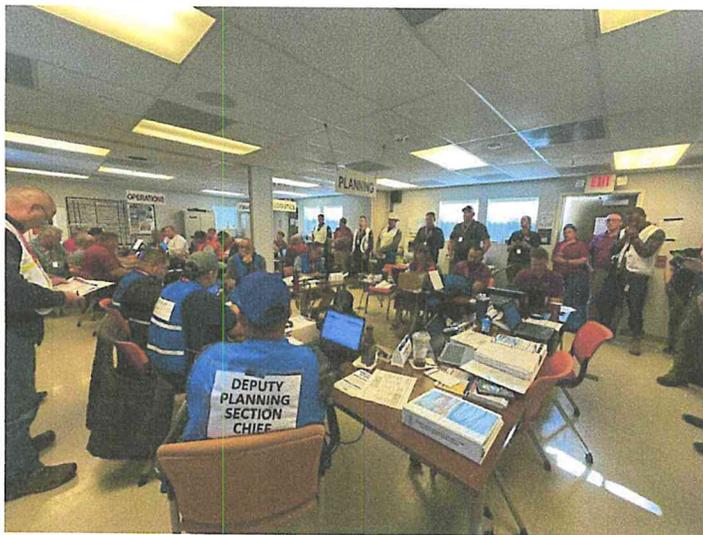
- Compliance Plans (Sec. 25B-10(a)(6).)
 - “The requirements of this finding are satisfied. County staff confirmed that all relevant compliance plans have been updated with current emergency contact information pertaining to Sable.” (Findings, pp. 5, 8, 12.)
- Transition Plans (Sec. 25B-10(a)(7).)
 - “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.” (Findings, pp. 5, 8, 12.)

County Staff Reviewed the Following Plans

1. Las Flores Pipeline Integrated Contingency Plan (including valid & effective oil spill contingency plan)
2. Las Flores Pipeline Noise Monitoring and Control Plan
3. Las Flores Pipeline Pump Station Fire Protection Plan
4. Las Flores Pipeline SIMQAP
5. Las Flores Pipeline Site Security Plan
6. Santa Barbara Harbor Use Plan
7. SYU/POPCO Emergency Response Plan
8. SYU/POPCO Fire Protection Plan
9. SYU/POPCO Groundwater Management Plan
10. SYU/POPCO Integrated Noise Monitoring Plan
11. SYU/POPCO NGL Inventory Management Plan
12. SYU/POPCO Preservation Plan
13. SYU/POPCO Security Control Plan
14. SYU/POPCO SIMQAP
15. SYU/POPCO Transportation Risk Management and Prevention Program (TRMPP)

Sable Conducted Required Emergency Drills

“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.” (Findings, pp. 5, 9.)



Sable/PPC performed an onshore emergency response drill with California Department of Fish and Wildlife's Office of Spill Prevention ("OSPR") and Santa Barbara County Fire Department ("SBC Fire") present in July 2024.



Sable performed a federally-monitored emergency response drill with the U.S. Coast Guard ("USCG"), the Bureau of Safety and Environmental Enforcement ("BSEE"), the California State Lands Commission, OSPR and SBC Fire present in September 2024.

Sable Meets Operator Capability Requirements

- “The requirements of this finding are satisfied. Sable's Executive Management Team have managed oil and gas exploration and production businesses in the Pacific Ocean, offshore Texas and Louisiana, and onshore California for more than 30 years.
- Sable's Onsite Middle Management Team have all transferred over from similar roles at the Las Flores Canyon Facilities under Exxon, with an average of 21 years of experience working at the facilities.
- Over 95% of ExxonMobil employees transferred over in their same or similar capacity.
- All employees and management have been trained on the facility-specific Compliance Plans.
- Sable management 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. (Findings, pp, 6, 9, 12-13.)

Sable Management Team's Extensive Safety Track Record

Management Team Previously Operated in Santa Barbara

- Received Santa Barbara County's First and Only "Resolution for Good Operator" Recognizing Outstanding Operating Performance
- Ranked MMS's (now BSEE) Best Operator in the Pacific OCS for Safety of Platform and Pipeline Operations
- Santa Barbara County Commendation for Outstanding Maintenance Practices at LOGP



- **2011:** Occupational Excellence Achievement Award for 21 PXP locations
- **2010:** Occupational Excellence Achievement Award for PXP's California Los Angeles Basin San Vicente and Packard locations
- **2009 – 2010:** Perfect Record Award for operating 11,390 employee hours without occupational injury or illness involving days away from work
- **2009:** National Industry Leadership Award
- **2008:** Occupational Excellence Achievement Awards for Outstanding Safety Practices
- **2007:** Occupational Excellence Achievement Awards for Outstanding Safety Practices
- **2008:** Recipient of the Environmental Lease Maintenance Award
- **2007:** Recipient of the Environmental Lease Maintenance Award
- **2006:** Recipient of the Clean Lease Awards
- **2006:** Recipient of the Environmental Lease Maintenance Award
- **2005:** Recipient of the Environmental Lease Maintenance Award
- **2004:** Recipient of the Environmental Lease Maintenance Award
- **2006:** U.S. Bureau of Land Management Operator of the Year Award
- **2006:** Best Management Practices National Award in the area of Habitat Conservation

World Class Quality and Safety Assurance

- **Santa Ynez Unit and POPCO Gas Plant**

- Production facilities being fully “re-commissioned” to original world-class design specifications
 - Equipment will meet “as-new” service requirements
 - Facilities maintained since 2015 shutdown with continuous monitoring of critical systems to ensure equipment maintained for re-commissioning
 - Conducting testing (wall thickness measurements) of all process piping and vessels to ensure equipment meets original design requirements
 - Testing all process and safety control devices to ensure they meet or exceed current design standards
 - Pressure testing all piping and equipment above maximum expected operating pressures to provide extra measure of safety
- Upgrading the existing leak detection system on emulsion pipeline to shore to current state-of-the-art technology

World Class Quality and Safety Assurance

- **Las Flores Pipeline**

- Implementing a world-class integrity management program, using state-of-the-art management practices, multiple annual internal inspections, planned cathodic protection upgrades and more
 - Anomaly repair criteria is **20% more restrictive** than current regulations - **far exceeding industry standards**
 - Integrity tool run frequency is **10 times greater** than current regulations
 - Restart hydrotest criteria, including “spike tests,” will **ensure the pipelines are in as-new condition and good for decades of safe operation**
- Incorporating substantially enhanced leak detection and system improvements
 - Includes real time transient monitoring, additional flow meters, pressure instrumentation and other enhancements
- Significantly reduced system reaction times using automatic shutoff systems and 27 new emergency flow restriction devices
 - Meets and exceeds California’s Best Available Technology mandates
- Sable has voluntarily enhanced its emergency response capabilities through deployment of additional Spill Response Teams and strategically located response equipment
 - Active engagement with local emergency responders
 - Establishing a local control center in Santa Maria, vs. prior location of Midland, TX

Cathodic Protection Enhancements

- This Board already considered and rejected claim that cathodic protection did not meet permit requirements:
 - **Cathodic protection system remains intact** and is actively monitored under **exclusive jurisdiction of OSFM and DOT**
 - The FDP and associated Conditions of Approval do not include cathodic protection requirements
 - Staff report confirms Sable is in **full compliance** with FDP
- Sable received OSFM and PHMSA “waiver” allowing the company to **enhance integrity** measures beyond existing cathodic protection, with **over 60 enhancements**, including:
 - Enhanced anomaly response, repair criteria, and accelerated reassessments of pipeline integrity
 - Integration of data from appropriate alternating in-line inspection tool technologies designed to ascertain various types of integrity concerns
 - Improved cathodic protection test stations located every mile or less
 - Significantly more frequent inspections
 - Permanent removal of any insulation encountered during repair and maintenance program
 - Coating repair procedures to prevent external corrosion and seal transition areas
- Existing cathodic protection is in full compliance with original EIR/EIS project description

Appeals Should Be Denied

- Appeals filed by Center for Biological Diversity/Wishtoyo Foundation and Environmental Defense Council/Get Oil Out!/Santa Barbara County Action Network
- Appellants ask the County to exceed its authority
 - State and federal law preempt the County from regulating certain pipeline operations
 - County confirmed, in Celeron settlement, that federal and state authorities have exclusive authority over pipeline safety
- Appeals ignore evidence supporting Planning Commission's findings and misrepresent County Code requirements
 - Chapter 25B outlines clear criteria that have been met, if not exceeded
 - Because the findings have been properly made, the applications must be approved
- The Planning Commission considered and rejected all of Appellants' arguments
- All Chapter 25B requirements have been met
- **The appeals should be denied**

Appellants Misstate Facts and Law

- Appellants claim that the County must require new permits to authorize the facilities
 - Existing permits are still valid and none of the circumstances allowing modification or revocation have occurred
 - Facilities are in compliance with all conditions and will continue to be operated in compliance with the permits
- Appellants demand additional financial assurances
 - Permits only require bonding upon permanent cessation of operations; this Board has never required a cessation bond
 - Sable has provided evidence of financial assurances well above and beyond what is required by the permits or the County Code
- Appellants argue that the facilities are not in compliance with permit requirements
 - This Board determined that the prior owner/operator was in compliance with all County requirements in September 2023
 - Nothing has changed in ~18 months - Sable continues to comply with all permit and County Code requirements
- Appellants claim that County staff misled the Planning Commission
 - Planning Commission reviewed hundreds of pages of materials and listened to hours of public testimony before making the required findings and approving the transfers
 - Appellants and the public had many opportunities to present their claims, which were fully rejected by the Planning Commission
- Appellants argue that CEQA requires additional review of the County's action
 - Approval of the transfers is an administrative action that is not a project under CEQA
 - Consistent with prior approvals under the same County Code section, approval of the change of owner, operator and guarantor is exempt from CEQA

EDC Relies on Draft Law that was REJECTED

- EDC cites to various County documents analyzing prior drafts of Chapter 25B that were considered, but rejected and never enacted.
- Relying on these sources, EDC argues that the County authority extends far beyond the narrow scope outlined in the plain language of Chapter 25B.
- The additional financial assurances and abandonment commitments EDC requests are not included in Chapter 25B.

REJECTED Draft Ordinance Language (Summer 2001)	ACTUAL Chapter 25B Language
<p>DRAFT Sec. 25B-9(1). b) Financial Guarantees. The proposed owner, operator, or other 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.</p>	<p>Sec. 25B-9(a)(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.</p>
<p>DRAFT Sec. 25B-9(5). Upon making the findings listed in Section 25B-9(1), (2), (3), or (4), the Director shall approve the change of owner, operator, or guarantor, or approve the temporary operator. The Director may impose additional conditions on the permit, except for applications approved under Section 25B-9(4), in order to ensure that the new owner, operator, temporary operator, or other guarantor maintains adequate financial guarantees for operations and abandonment.</p>	<p>Sec. 25B-9(g). Approval. Upon making the findings listed in Sec. 25B-9.1 to 9.6 the director shall approve the change of owner, operator, or guarantor, or approve the temporary operator. The director may impose additional conditions on the permit, except for applications approved under Sec. 25B-9.4, in order to ensure that any insurance or other financial guarantees that were submitted to and relied on by the director as a basis to make any finding required by this chapter are maintained.</p>
<p>DRAFT Sec. 25B-9(1). c) Abandonment. The proposed owner, operator, or other guarantor has demonstrated the financial capability through financial guarantees to comply with all federal, state and local law and permits regarding abandonment of the facility and remediation of contamination.</p>	<p>N/A</p>

NOVs Associated with Repair and Maintenance Activities

- NOVs (Notices of Violation) are not a basis to deny approval of the transfers:
 - Outside the scope of Chapter 25B – not issued by the County and not issued before the applications were “deemed complete.”
 - Code does not contemplate denial even for County NOVs; only assigns responsibility to work through them.
- ***Existing approvals and authorizations allowed Sable to repair pipeline anomalies, install safety valves, and support offshore pipeline facilities as required by federal and state regulations***
- On September 27, 2024, Sable received a NOV from the Coastal Commission as to the anomaly repair and safety valve work
 - Sable worked with Commission staff to complete interim onshore measures to secure repair sites as Sable worked with Commission and County staff to evaluate the NOV allegations
- ***On February 12, 2025, the County confirmed in writing that Sable’s anomaly repair work was previously authorized***
 - Commission staff dispute the County’s conclusions and commenced enforcement proceedings
- Sable has been forced to file suit against the Coastal Commission to preserve its rights consistent with the County’s confirmation that the repair work was previously authorized
- On February 11, 2025, Commission staff issued a separate NOV for the offshore SYU pipeline support work
 - This work was fully authorized by BSEE and SLC and is the same as past offshore work that did not require a new coastal development permit
- Sable also is in receipt of notices from the Water Board and CDFW regarding alleged violations for completed work on the pipeline route and is working with those agencies toward a cooperative resolution

Appellants Focus On Everything But Chapter 25B

- Appellants cite to news articles, “expert” reports, and court filings regarding unrelated facilities and unrelated business entities to distract from the narrow inquiry in front of the Board.
- Appellants focus on matters exclusively within the control of state and federal agencies:
 - Appellants’ submissions are full of materials from federal and state agencies, including BOEM, BSEE, PHMSA, OSFM, CalGEM, State Lands, various state and federal courts, and many others.
 - Appellants cite no authority that would permit the County to override these federal and state agencies.
- Appellants submit speculative expert reports on Pipeline restart—but pipeline safety is in the exclusive control of OSFM under delegated authority granted by PHMSA.
 - The County acknowledged in Celeron and has repeatedly acknowledged since—it has no jurisdiction over pipeline safety.
 - Pipeline restart is not before this Board.
- Appellants ask the Board to engage in extra-statutory actions that are not authorized by Chapter 25B.
 - Appellants cite unadopted language that was specifically rejected and is not in Chapter 25B.
 - Appellants invite the Board to act arbitrarily and in excess of its jurisdiction.
- This Board should follow Chapter 25B.

Conclusion

1) Sable has met all Chapter 25B requirements.

- Sable management team has decades of safe oil and gas operations
- Sable is committed to a state-of-the-art pipeline
- Sable's extensive insurance and cash reserves exceed requirements

2) Pipeline Restart

- Approval of permit transfer **does not** authorize pipeline restart
- Pipeline restart is a separate process subject to state and federal regulatory requirements

Request of the Board of Supervisors

- Sable respectfully requests that the Board of Supervisors:
 - Deny the appeals;
 - Determine that the requested Change of Owner, Operator and Guarantor applications are not a “project” and exempt from CEQA;
 - Make the required findings under Santa Barbara County Code Sections 25B-9 and 25B10; and
 - Approve the Change of Owner, Operator and Guarantor applications.

DATE: _____ TIME: _____
LEBIVOCHELLA

Katherine Douglas

From: Lauren French <Lauren@thesealeague.org>
Sent: Monday, February 24, 2025 12:27 PM
To: sbcob
Subject: Opposition to the Transfer of Permits for the Santa Ynez Unit to Sable Offshore Corporation

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.

Dear Board of Supervisors,

I am writing to express my strong opposition to the proposed transfer of permits from ExxonMobil to Sable Offshore Corporation for the operation of the Santa Ynez Unit, including the associated offshore platforms, onshore processing facilities, and the pipeline responsible for the devastating 2015 Refugio Oil Spill.

As a resident of Santa Barbara, I have witnessed firsthand the profound impact that the 2015 spill had on our community and environment. The spill devastated 150 miles of California coastline, destroying thousands of acres of shoreline and subtidal habitats, and causing the injury or death of countless marine animals.

The ocean has been a constant in my life. Now, I get to see that same impact on kids in our community at Sea League. We can't risk taking that away from them. A spill could erase these experiences, harming not just the ocean but the next generation of ocean lovers. Protecting our coast means ensuring they have the same chance to learn, explore, and build a lifelong connection to the water.

Sable Offshore Corporation's intention to restart the same corroded pipeline without comprehensive environmental review is deeply concerning. An analysis prepared for Santa Barbara County indicates that restarting this defective pipeline could result in a spill once a year and a major rupture every four years. Moreover, the California State Fire Marshal has granted Sable a waiver to operate the pipeline without effective corrosion protection—the very issue that led to the 2015 disaster.

Sable's financial instability further exacerbates these concerns. Operating at a \$682 million deficit, there is a significant risk that the company may be unable to cover the costs of remediation in the event of another spill, potentially leaving taxpayers to shoulder the burden.

Additionally, Sable has already demonstrated a lack of responsible operation, receiving notices of violations from three state agencies for breaching laws designed to protect coastal resources and water quality.

The Santa Ynez Unit was previously the largest source of greenhouse gas emissions in Santa Barbara County. Restarting these facilities would significantly increase fossil fuel production and greenhouse gas emissions, undermining the county's climate goals and contributing to the global climate crisis.

Given these factors, I urge you to deny the transfer of permits to Sable Offshore Corporation. Approving this transfer poses unacceptable risks to our environment, public health, and economic well-being.

Thank you for considering my comments.

Sincerely,
Lauren French



In partnership with: University of California Santa Barbara | Wilderness Youth Project | YMCA

Operations Coordinator

Lauren French

415-328-1811

thesealeague.org

Katherine Douglas

Applicant support letters

1



From: David Hourin <dhourin@fionahuttonassoc.com>
Sent: Monday, February 24, 2025 1:16 PM
To: sbcob
Subject: Public Comment for February 25 Meeting - Item 25-00144
Attachments: Sable Support Letters.pdf

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.

Dear Santa Barbara County Board of Supervisors,

I am writing on behalf of Sable Offshore regarding the appeal of the Planning Commission's approval for the Santa Ynez Unit change of ownership at your upcoming February 25 meeting.

I am sharing the attached letters of support for Sable's operation of the Las Flores Pipeline System that were previously sent to Governor Newsom and members of his administration from the Santa Barbara South Coast Chamber of Commerce, the Coastal Band of the Chumash Nation, and Sable's employees and contractors.

These letters demonstrate the broad support for this project and Sable's commitment to the Santa Barbara County community. Thank you for your consideration.

Best,
David



David Hourin
Account Executive
Los Angeles | Sacramento
T: 818.760.2121
C: 213.670.5866
W: [FionaHuttonAssoc](http://FionaHuttonAssoc.com)
[LinkedIn](#)

The information contained in this e-mail message is intended only for the personal and confidential use of the recipient(s) named above. This message is privileged and confidential. If the reader of this message is not the intended recipient or an agent responsible for delivering it to the intended recipient, you are hereby notified that you have received this document in error and that any review, dissemination, distribution, or copying of this message is strictly prohibited. If you have received this communication in error, please notify us immediately by e-mail, and delete the original message.

1/17/2025

Governor Gavin Newsom
State of California
1303 10th Street, Suite 1173
Sacramento, California 95814

RE: Support for Sable's Santa Ynez Unit Restart Project

Dear Governor Newsom,

The Santa Barbara South Coast Chamber of Commerce, representing businesses from Goleta to Carpinteria in southern Santa Barbara County, would like to express our strong support for Sable's efforts to restart the Santa Ynez Unit (SYU) and Las Flores Pipeline System operations.

From the perspective of a community organization, we have witnessed Sable's dedication to being a community partner. Upon joining the community, Sable wasted no time in reaching out to us, and others, to understand opportunities where they can support our work throughout Santa Barbara. These actions reflect a company looking to establish roots in the community. Sable has already established a corporate and social responsibility giving program that has already begun to show a strong impact in our community, investing hundreds of thousands of dollars annually. Sable has indicated that they intend to increase that community investment dramatically as their work in Santa Barbara County continues.

As a business-representing organization that prides itself on being the bridge between business and government, we recognize that Sable's project aligns perfectly with your California Jobs First Economic Blueprint. Their commitment to creating good-paying jobs and driving regional economic growth is exactly what our community needs. The project will not only maintain existing jobs, but it will also create hundreds of new positions upon restart. Sable's restart of the SYU and Las Flores systems will help California strike the necessary balance between responsible resource extraction and environmental stewardship that will propel our Blue Economy into the future.

Businesses are already navigating complex federal, state, and local regulations. Sable has demonstrated their commitment to meeting or exceeding all regulatory requirements while investing in our local economy. This is exactly the kind of responsible business development that can help drive economic growth in Santa Barbara County and serve as a model for other regions across California. The project will generate significant tax revenue for essential public services while creating positive economic ripple effects throughout our local communities.

We respectfully urge you to support this important project that will benefit both our local community and the state as a whole.

Sincerely,



Kristen Miller
President & CEO
Santa Barbara South Coast Chamber of Commerce



November 14, 2024

Governor Gavin Newsom
1021 O Street, Suite 9000
Sacramento, CA 95814

Dear Governor Newsom,

Following a thorough assessment of both current and historical project management practices, as well as the existing condition of the facilities and the planned repairs, operations, and maintenance for the Las Flores Pipeline and Santa Ynez Unit, I am confident in Sable Offshore Corporation's ability to operate safely and equitably. Since the pipeline's shutdown in 2015, Sable has implemented a robust maintenance program. While our reliance on fossil fuels continues, I believe Sable is well-equipped to manage the pipeline effectively. I understand that testing is currently being conducted under the oversight of both federal and California state agencies to ensure adherence to the rigorous standards set forth in the Consent Decree.

Furthermore, I am assured that the contracted archaeological firm is adhering to the ethical and legal guidelines essential for completing this project as part of cultural resource management on our ancestral lands.

These statements reflect my current beliefs and expectations regarding Sable's management.

Sincerely,

Gabriel Dominguez Frausto
Tribal Chairman
805-568-8063

Coastal Band of the Chumash Nation
PO Box 4063, Santa Barbara, CA 93140
Tribal Office 805.568.8063



January 23, 2025

Governor Gavin Newsom

State of California

1303 10th Street, Suite 1173

Sacramento, California 95814

Re: Support for Sable's Santa Ynez Unit Restart Project

Dear Governor Newsom,

As representatives of the 115 employees and over 400 contractors locally employed by Sable Offshore Corp. (Sable) in the greater Santa Barbara area, **we write to express our strong support for Sable's efforts to restart the Santa Ynez Unit (SYU) and Las Flores Pipeline System operations.**

When Sable acquired the SYU and POPCO facilities in February of this year, they retained the experienced operations and maintenance staff as well as the local management team. Collectively, each employee brings an average of 20 years' worth of experience and knowledge to the table. This expertise ensures both the safe operation and management of the systems as well as rigorous compliance with all regulatory requirements that protect both Sable employees and the public.

Sable has maintained strong relationships with qualified contractors who have long-term histories of providing essential services including base maintenance and construction, safety services, landscaping, security, material handling and inventory management, third-party testing and inspection services, and required pipeline integrity management. This continuity demonstrates Sable's commitment to the people whose families and livelihoods depend on these local jobs.

The Sable management team's roots in Santa Barbara run deep, with the management and executive team having worked together in the area for more than 20 years. Upon acquiring the systems, they immediately implemented comprehensive cross-training programs and revised their well-established protocols to meet or exceed all applicable local, state and federal regulations. This includes robust day-to-day operations, emergency response, oil spill response, damage prevention, pipeline surveillance, facility inspections, right-of-way maintenance, records management, and facility security protocols.

The restart of these facilities represents exactly the kind of targeted regional economic development that aligns with your California Jobs First Economic Blueprint. Once pipeline operations restart, Sable will need to hire an additional 300 employees to staff the three offshore platforms, providing family-sustaining wages and benefits. The project is expected to generate \$8 million annually in tax revenue for Santa Barbara County alone, funding essential public services and creating positive economic ripple effects that will go far beyond the local community.

California's ability to maintain and expand its position as the 5th largest economy in the world requires that it pursue both the responsible resource extraction that will bring the most regulated and environmentally friendly refinery oil to market, as well as the conservation of our marine and coastal environments. Sable's deep expertise and steadfast commitment to meeting or exceeding all environmental regulations shows they are the right leaders to strike that balance.

Sable puts the safety of their workers and their responsibility to the community first, while providing good-paying jobs that drive regional, statewide and national economic growth. We would like to reiterate our support and confidence in Sable as they work with us to get this project done for California.

Sincerely,

Hunter Allison (Sable)

Carlos Avelar (Sable)

Daniel Ballou (Sable)

Doug Bolingbroke (Sable)

Aaron Boshoff (Sable)

Todd Brand (Sable)

Roberto Bueno (Sable)

Ignacio Bueno (Sable)

Bryan Burkett (Sable)

Luke Carlson (Sable)

Jose Crespo (Sable)

Justin Crowell (Sable)

Carey Crowell (Sable)

Shane Cruddas (Sable)

Albert Cruz (Sable)

Milton Dean (Sable)

Chad Domingues (Sable)

Ryan Dunehew (Sable)

James Esparza (Sable)

Trent Fontenot (Sable)

Christopher Gankas (Sable)

Adrian Garcia (Sable)

David Guillory (Sable)

Coy Hartsell (Sable)

Casey Heichberger (Sable)

Joseph Herrera (Sable)

Arlo Hicks (Sable)

Brian Johnson (Sable)

Stephanie Katers (Sable)

Patrick Kennedy (Sable)

Sean Kennedy (Sable)

Caleb Krummrich (Sable)

Blake Lapolla (Sable)

Gadell LeMaire (Sable)

Jarvis Littleton (Sable)

Rosendo Lomeli (Sable)

Ramiro Lopez (Sable)

Adam Maingot (Sable)

Brandon Manhard (Sable)

Brian Massey (Sable)

Nic Mayorga (Sable)

Matthew Meyer (Sable)

Ashton Mills (Sable)

Dane Motty (Sable)

Eric Moya (Sable)
Ray Murrillo (Sable)
Edwin Ness (Sable)
Jeff Patterson (Sable)
Joe Perez (Sable)
Joe Peschier (Sable)
Kevin Pizano (Sable)
Donn Purington (Sable)
Edward Ramirez (Sable)
Ceaser Ramos (Sable)
Ernest Reveles (Sable)
Paul Rodriquez (Sable)
Joaquin Romero (Sable)
Jimmie Ruiz (Sable)
Dale Rydberg (Sable)
Robert Simas (Sable)
Brian Smith (Sable)
Jose Solorza (Sable)
Steven Suriago (Sable)
Patrice Surmeier (Sable)
Henry Szczur (Sable)
James Taylor (Sable)
Rose Teague (Sable)
Diego Torres (Sable)
Raymond Valenzuela (Sable)
Bert Van Schoyck (Sable)
Jamika Velasquez (Sable)
Glenn Vidal (Sable)
Peter Walsh (Sable)

Robert Wienold (Sable)
Glen Wind (Sable)
Sean Windbiel (Sable)
David Alonzo (Amenum)
Gabriel Mendoza (Audubon Engineering)
William Swonger (Audubon Engineering)
Charles Roberts (BeaconWest)
Porfirio Alaniz (Becht Industrial)
Alejandro Araujo (Becht Industrial)
Hernandez Austino (Becht Industrial)
Jose Cervantes (Becht Industrial)
Rudy Cervantes (Becht Industrial)
Colby Cloud (Becht Industrial)
Adrian Garcia (Becht Industrial)
Alejandro Garcia (Becht Industrial)
Jose Garcia (Becht Industrial)
Dante Gomez (Becht Industrial)
Andres Gutierrez (Becht Industrial)
Austino Hernandez (Becht Industrial)
Daniel Posadas (Becht Industrial)
Alejandro Ramirez (Becht Industrial)
Derek Rashall (Becht Industrial)
Homero Solis (Becht Industrial)
Jose Zamora (Becht Industrial)
Jonathan Beck (C.D. Lyon)
Robert Benson (C.D. Lyon)
Arturo Cazares (C.D. Lyon)
Alexray Chavarria (C.D. Lyon)
Gary Crites (C.D. Lyon)

Derrick Cuevas (C.D. Lyon)

Jose Delgado (C.D. Lyon)

Josh Esquivel (C.D. Lyon)

Javier Flores (C.D. Lyon)

Adrian Garcia (C.D. Lyon)

Daniel Garcia (C.D. Lyon)

Jesus Hilario (C.D. Lyon)

Peter Montoya (C.D. Lyon)

Scott Pemberton (C.D. Lyon)

Jeremy Perez (C.D. Lyon)

Jose Rebollar (C.D. Lyon)

Vicente Robles (C.D. Lyon)

Frank Rocete (C.D. Lyon)

Daniel Tamayo (C.D. Lyon)

Alex Vargas (C.D. Lyon)

Chris Ward (C.D. Lyon)

Art Ewing (Caltrol)

Jose Osornio (Caltrol)

Francisco Amparan (Code Red Safety)

Kevin Gonzalez (Cor-ray Painting)

Adrian Muro (Cor-ray Painting)

Frank Muro (Cor-ray Painting)

Sergio Rojas (Cor-ray Painting)

Henry Segura (Cor-ray Painting)

Kenneth Green (Custom Automated Controls)

Tim Bertrand (Danos)

Merlin Foret (Danos)

Damon Hebert (Danos)

Mike Lantz (Danos)

Tommy Lege (Danos)

Curry Lejeune (Danos)

Mike Maxey (Danos)

Adrian Nunez (Danos)

Brandon Peschier (Danos)

Haven Simoneaux (Danos)

Dontaine Butcher (HMT LLC)

Joseph Cooper (HMT LLC)

Edward Diaz (HMT LLC)

Jesus Fierro (HMT LLC)

Luis Gonzalez (HMT LLC)

Justin Litko (HMT LLC)

Laura Mancina (HMT LLC)

Jose Ochoa (HMT LLC)

David Ramos (HMT LLC)

Lawrence Robinson (HMT LLC)

JaQuavis Weary (HMT LLC)

Daniel Crawford (Oilfield Electric)

Alan Lujan (Oilfield Electric)

Steve Farley (OST Trucks & Cranes)

Jose Gonzalez (OST Trucks & Cranes)

Miguel Rodriguez (OST Trucks & Cranes)

Andrew Chavez (PSC)

John Guagliardo (PSC)

Lee Mallatt (PSC)

Steve Shively (PSC)

Mick Sullivan (PSC)

Jaime Shafer (RCP)

Marcelo Alvarez (Rev1 Oil & Gas)

Paul Benoit (Rev1 Oil & Gas)
Jamie Bettencourt (Rev1 Oil & Gas)
Angus Bozeman (Rev1 Oil & Gas)
Pete Campassi (Rev1 Oil & Gas)
Erik DeFoe (Rev1 Oil & Gas)
Leo Dickhaut (Rev1 Oil & Gas)
Thomas Dohnalik (Rev1 Oil & Gas)
Keiven Esquivel (Rev1 Oil & Gas)
Michael Favela (Rev1 Oil & Gas)
Craig Ford (Rev1 Oil & Gas)
Brett Glynn (Rev1 Oil & Gas)
Hugo Guzman (Rev1 Oil & Gas)
Roberto Huerta (Rev1 Oil & Gas)
Michael Kelley (Rev1 Oil & Gas)
Jammie Lange (Rev1 Oil & Gas)
Joe Lara (Rev1 Oil & Gas)
David Lopez (Rev1 Oil & Gas)
Stephen Lopez (Rev1 Oil & Gas)
Yaeel Lopez (Rev1 Oil & Gas)
David Lopez (Rev1 Oil & Gas)
Ethan Maxson (Rev1 Oil & Gas)
Jason Miller (Rev1 Oil & Gas)
Hudley Owens (Rev1 Oil & Gas)
Enrique Ramos (Rev1 Oil & Gas)
Clifford Richey (Rev1 Oil & Gas)
Cort Russell (Rev1 Oil & Gas)
Peter Sarmiento (Rev1 Oil & Gas)
Logan Schexnaider (Rev1 Oil & Gas)
Justin Smith (Rev1 Oil & Gas)

Zardo Villanueva (Rev1 Oil & Gas)
Pedro Villarreal (Rev1 Oil & Gas)
Eddie Weaver (Rev1 Oil & Gas)
Terence Whitworth (Rev1 Oil & Gas)
Mike Terrell (Terrell Engineering)
Randall Duhon (TIGA)
Lance Griffin (TIGA)
Steve Landry (TIGA)
Cody Reynen (TIGA)
Bennett Adkins (West Coast Environmental)
Luis Arredondo (West Coast Environmental)
Bill Ayers (West Coast Environmental)
Jayson Grgas (West Coast Environmental)
Timothy Henry (West Coast Environmental)
Victor Ledezma (West Coast Environmental)
Mike Reynaga (West Coast Environmental)
Kyle MacIntosh (West Coast Logistics)
Bryan Lyon (West Coast Logistics)
Shaun Neibrandt (West Coast Logistics)
Daniel Tims (West Coast Logistics)

CC Nathan Barankin, Chief of Staff, Office of Governor Newsom
Ann Patterson, Cabinet Secretary, Office of Governor Newsom
Jamie Callahan, Senior Counselor on Infrastructure, Office of Governor Newsom
Christine Hironaka, Senior Advisor for Energy, Office of Governor Newsom

Katherine Douglas

Public Comment

1



From: Noah Boland <noah@healtheocean.org>
Sent: Monday, February 24, 2025 1:26 PM
To: sbcob
Cc: Hillary Hauser; Hillary Hauser
Subject: Public Comment: Feb 25, 2025 Agenda Item #1 - Sable Appeals
Attachments: Public Comment Re Feb 25_2025 Agenda Item_1 Sable Appeals.pdf

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.

Dear Clerk of the Board,

Please distribute the attached public comment (PDF) to the Board of Supervisors for the Feb 25, 2025 Board meeting.

Thank you!

Noah Boland

--



Noah Boland | Policy Analyst
Heal the Ocean
1430 Chapala Street
Santa Barbara, CA 93101
(805) 965 - 7570
noah@healtheocean.org
www.healtheocean.org



1430 Chapala Street, Santa Barbara, CA 93101;
PO Box 90106, Santa Barbara, CA 93190; Telephone (805) 965-7570; fax (805) 962-0651
www.healtheocean.org

Friday, February 21, 2025

Ms. Laura Capps, Chair
County Board of Supervisors
123 East Anapamu Street
Santa Barbara, CA 93101
Via email: sbcob@countyofsb.org

Re: February 25, 2025 BOS Agenda Item #1: Change of Owner, Operator, and Guarantor for the Santa Ynez Unit, POPCO Gas Plant, and Las Flores Pipeline System

Dear Chair Capps and Honorable Supervisors:

Heal the Ocean strongly **Opposes** your staff recommendation that the Board of Supervisors deny the Appeals challenging the Planning Commission Approval of the Sable Offshore pipe-line re-start (Case Nos. 24APL-00025 and 24APL-00026).

We urge the Board to instead uphold the Appeal and deny Sable's application to transfer permits for the Santa Ynez Unit, POPCO Gas Plant, and Los Flores Pipelines. Our highly sensitive, biologically diverse, and economically important coastline cannot take another oil spill.

Santa Barbara is badly bruised by oil spills – including the infamous Union Oil blowout of 1969 that was known as a disaster worldwide, and which spawned Earth Day. The Board of Supervisors is the seat of Santa Barbara County government, the voice of the people, and Santa Barbara citizens rely on your leadership. Heal the Ocean does not believe the Supervisors really want to ignore its citizens who have worked long and hard to close down oil operations in the Santa Barbara Channel.

We don't believe the supervisors really want to give a green light to a company that does not have the critical corrosion protection technology required by the permits. Further, there has not been an in-depth evaluation of the proposed owner/operator's financial and operational capacity. Heal the Ocean has been deeply involved in the problem of the leaking, abandoned oil wells off the Summerland coastline that have no owners, no insurance, nothing. Working with the California State Lands Commission (SLC), we have lobbied for \$14M in funding for SLC to cap these wells, which were abandoned by wildcat operators after they had finished their exploring. *That cleanup is still not finished, and another \$14M is needed to carry on with cleanup work.*

We know what happens when an oil company goes bankrupt and leaves its mess behind. Who picks up the cost? The state, the county, tax-paying citizens, you and me. Sable has not demonstrated it can even stick around to do a proper decommissioning, the public has not seen

a proper in in-depth financial analysis as the Appeal states, the California Coastal Commission has issued two Cease and Desist orders, Sable has received notices of three violations from state agencies, and right now, Santa Barbara citizens are irate about Sable opening up oil operations on the Gaviota Coast again. And the Board of Supervisors will say it's OK with this? No, please No.

In closing, we would like to turn your attention to the notice we published and sent to Heal the Ocean's 3,500 membership in our May 2015 Newsletter. We had just put this publication to bed, May 19, 2015 – the very same day as the Refugio oil spill. Then, heading north on the 101 freeway, we literally drove into the area, not knowing the spill had just happened. The stench of oil on the stretch of road between Refugio and El Capitan was tremendous. Trucks and uniformed personnel were pouring into the area. Once again, this mayhem and discord to the ocean. It was the 1969 oil spill in repeat, as if we hadn't learned a thing.

These are the words we put in our Heal the Ocean message in 2015, and they are words still true today:

Loa Tree has formed a Stand in the Sand campaign, where on May 31, 2015 people will walk down State Street and join hands at the ocean's edge to signal,

Enough, already.

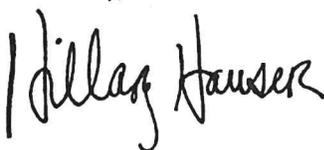
Stand in the Sand started with the Gulf oil spill. Many people joined hands at the edge of the ocean back then to send a message to the oil industry that it could not take one more step, one more beach, one more anything. I am taking part in the Stand in the Sand walk in Santa Barbara. I will personally find a different car to drive, and even take up bicycling again at the ripe old age of 70. Whatever our personal choices are, Heal the Ocean is taking a stand in the sand with everyone who works for the ocean.

We, too, say Enough, already.

The Sable pipeline is the very same pipeline that erupted in 2015. As the Board of Supervisors deliberates whether or not to allow this kind of operation to continue, we encourage the Supervisors to say, **Enough, already.** We ask the Supervisors to uphold the Appeal and deny Sable's application to continue operating on the Gaviota Coast. It's time for them to close up shop.

Thank you for the opportunity to comment.

Sincerely,



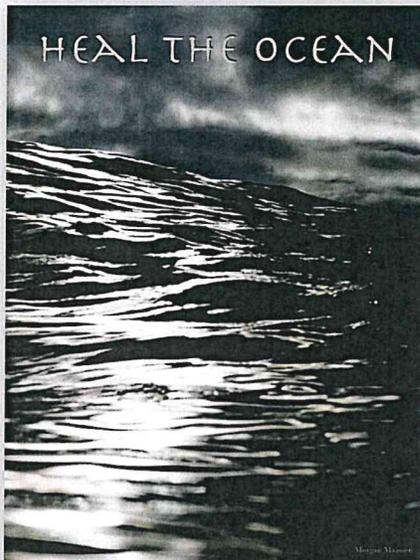
Hillary Hauser, Executive Director



Noah Boland, Policy Analyst



A SPECIAL MESSAGE TO OUR MEMBERS ABOUT THE REFUGIO OIL SPILL



During the winter of 2015 I stumbled across our newsletter's striking cover photo by well known ocean photographer Morgan Maassen.

I love this photo because it is Rincon during a winter night, and the mood is obvious. As all of us in the office

pondered the image of this black and stormy sea, there was not one of us who didn't also think, wow, it looks like an ocean of oil.

We worked night and day to get this issue to press, and we finished on May 19, 2015, the same day that the oil spill erupted at Refugio State Beach on the Gaviota coast.

Early the next day I left for an extended Memorial Day week in Northern California, and as I drove north on the 101 freeway I listened in horror at the news. When I reached the stretch of road between Refugio and El Capitan the stench of oil was tremendous. I pulled over and looked in utter dismay at the trucks and uniformed personnel pouring into the area.

(over)

Once again, this mayhem and discord to the ocean!
The 1969 oil spill in repeat, as if we haven't learned a thing! I was stunned. My car phone started ringing off the hook. Reporters, requests for statements, calls to the office from people wanting to know what they could do.

After dealing with the primary onslaught, my thoughts turned to the newsletter we had just put to bed. The oil disaster drowns out everything anyone is doing to protect the ocean. Cleaning up wastewater discharge seems dwarfed by comparison. Were we supposed to stop the presses on the newsletter? We decided emphatically: No! We go forward and redouble our efforts.

As I write this, Loa Tree has formed a Stand in the Sand campaign, where on May 31, 2015 people will walk down State Street and join hands at the ocean's edge to signal, *Enough, already.*

Stand in the Sand started with the Gulf oil spill. Many people joined hands at the edge of the ocean back then to send a message to the oil industry that it could not take one more step, one more beach, one more anything.

I am taking part in the Stand in the Sand walk in Santa Barbara. I will personally find a different car to drive, and even take up bicycling again at the ripe old age of 70. Whatever our personal choices are, Heal the Ocean is taking a stand in the sand with everyone who works for the ocean.

We, too, say *Enough, already.*

A handwritten signature in cursive script that reads "Hillary Hauser". The signature is written in dark ink and is positioned above the printed name.

Hillary Hauser

Katherine Douglas

From: Linda Stewart-Oaten <ellesso@yahoo.com>
Sent: Monday, February 24, 2025 1:41 PM
To: sbcob
Subject: Regarding the Exxon-Sable lease transfer

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.

Dear Santa Barbara County Board of Supervisors,

As a long term resident of Santa Barbara County, I'm urging you to rise to the occasion and put an end to the expansion of oil production, by blocking the Exxon-Sable lease transfer. This could well be your final opportunity to protect our county from horrendous environmental repercussions effecting both air quality and indeed quality of life for humans and animals along our coast and in the coastal waters. Once gone, the effect on our own lives--and on our tourist industry--will be damaged beyond repair.

The company known as Sable hasn't sufficiently demonstrated their ability to honor and abide by local and State regulatory standards. In fact they've repeatedly violated the Coastal Commission's Cease and Desist order and they've ignored the rulings of numerous other agencies.

What's more, Sable has had to rely on Exxon's financial support to launch their startup attempt. I would hope that is an obvious signal to all of us that Sable cannot manage to cover the costs of extracting oil from our coast safely. Sable simply doesn't have the financial assets to cover the costs of more disastrous oil spills, akin to those we've already experienced. What's alarming to me is that it's clear they're expecting to use the same, poorly patched and tattered pipeline used by Exxon. If it failed Exxon, why would anyone imagine it would function better under a more poorly funded company? Experts have predicted that another spill is possible. Why tempt fate?

I beg you to protect the people and the wildlife of Santa Barbara County from the greed of a demonstrably unqualified and reckless company.

Sincerely,

Linda Stewart-Oaten

167 Lyric Ln

Santa Barbara, CA 93110

Katherine Douglas

From: Laura Haston <laurahaston21@gmail.com>
Sent: Monday, February 24, 2025 2:16 PM
To: sbcob
Subject: Comment: Sable. Must verify that we will be safe otherwise deny transfer

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.

Dear Chair Capps and Members of the Board of Supervisors

I write in regards to your agenda item for tomorrow: Sable's application to transfer permits for the Santa Ynez Unit, POPCO gas plant, and the Las Flores Pipeline.

There is strong community opposition to Sable re-starting the pipeline that ruptured in 2015, causing considerable ecological damage and substantial economic losses to our community. I share in that opposition. Please work hard to find a valid reason to be able to deny this transfer.

I know that there are complicated issues of jurisdiction and authority.

However, have you really done everything you can to try to protect your community and the people that you represent from a potential future oil spill?

Currently, we appear to be witnessing an abdication of duty by our Congress in not addressing what appears to be overreach by the Executive branch and in not protecting the rule of law and the Constitution.

I hope that we will not witness the same abdication of duty by our Board of Supervisors. We are counting on you to exert all of the authority that you possibly have to make sure that the community is not put at significant risk of a future oil spill, which would likely be devastating to Santa Barbara and the Gaviota Coast. You keep saying that you have no authority to stop Sable? Is that really true? Or are you just trying to avoid the unpleasantness of another court case involving Sable. Sometimes it is worth it to fight. And, this is likely one of those times.

There are many reasons to believe that Sable will not be a good community partner. There is little evidence that Sable cannot afford to cover the cost of remediation if/when another spill occurs. Thus, not only will the community have to endure the destruction caused by another potential spill but we will likely have to pay for the clean-up of the spill as well.

Sable has not provided assurances that it will be able to pay to decommission its facilities when it is finished with them (or if in fact they never even restart them).

It is not clear that Sable has met all of the conditions of the permit that would allow transfer from Exxon to Sable since the pipeline does not have the critical corrosion protection technology required by the permits.

Sable has not been behaving like a good community partner given that it has received notices of violations from three state agencies and recently received a second cease-and-desist order from the Coastal Commission for continuing to do work on its facilities without a permit. Sable is behaving as if rules don't apply to them.

This is likely Sable at its best since it is trying to convince the Board and others to allow it to reopen the pipeline. Best is not looking very good. How will they behave once they are not having to try to get approval? Probably very very poorly. The questionable behavior of Sable shows that the Board cannot trust Sable to responsibly operate this project.

It appears that your County staff says that you have no authority to ask Sable questions, demand verification of its ability to meet financial obligations, and review whether its liability insurance is adequate. That sounds like baloney to me. We are counting on you to ask the tough questions and to verify that Sable can operate safely here in SB and be a good community partner. Please do the due diligence that is necessary! Until you can assure the public that we will be safe from future harm from this pipeline, you should not approve transfer.

Sincerely,

Laura Haston, PhD

•

Katherine Douglas

From: Kaytee Dobbs <kdobbs@ucsb.edu>
Sent: Monday, February 24, 2025 2:17 PM
To: sbcob
Subject: Support for Appeal Against Permit Transfers to Sable Offshore Corporation

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.

Dear Board of Supervisors,

I am writing to express my strong support for the appeal challenging the proposed permit transfers to Sable Offshore Corporation, particularly in light of the severe risks associated with restarting the Los Flores Pipeline—the same pipeline linked to the 2015 Refugio Oil Spill.

The appeal raises several critical concerns that indicate Sable has not met the necessary requirements under Chapter 25B. I summarize these concerns below:

1.

2.

3. Finality of Financial Responsibility (Issue #1):

4. The appeal points out that Sable's Certificates of Financial Responsibility remain

5. non-final because they rely on draft oil spill contingency plans that have not received formal approval. This creates significant uncertainty about Sable's ability to meet the financial obligations required in the event of a worst-case spill scenario.

6.

7.

8.

9. Oil Spill Contingency Plans (Issue #6):

10. Despite the requirements under Chapter 25B, Sable has not submitted fully approved

11. oil spill contingency plans. The pending approval from the Office of Spill Prevention and Response suggests that the current plans are incomplete, thereby failing to fully meet the mandated safety standards.

12.

13.

14.

15. Financial Capability and Operator Stability (Issues #3 and #7):

16. The appeal highlights serious concerns regarding Sable's financial health. Operating

17. at a considerable deficit with insufficient cash reserves, Sable may not have the financial stability required to safely manage operations or effectively respond to a major spill. This raises doubts about their ability to serve as a reliable operator.

18.

19.

20.

21. Regulatory Noncompliance and Safety Concerns (Issue #8):

- 22. Notices of Violation related to unpermitted construction activities on the pipeline
- 23. cast further doubt on Sable’s commitment to regulatory compliance and safe operations. Such noncompliance undermines confidence in their ability to manage the facilities responsibly.
- 24.
- 25.
- 26.

27. Predicted High Failure Frequency (Issue #10):

- 28. The appeal cites internal risk assessments projecting frequent spills and major
- 29. ruptures—an indication that the aging, corroded infrastructure remains vulnerable. Restarting the pipeline under these conditions could expose our community to recurring environmental disasters.
- 30.
- 31.
- 32.

33. Procedural and Transparency Issues (Issue #13):

- 34. Finally, the appeal contends that key documents (including original permits, full
- 35. insurance policies, and audited financial statements) were not adequately disclosed during the public review process. This lack of transparency further erodes public trust and raises questions about whether Sable has truly met all required conditions.
- 36.

Given these significant concerns, approving the permit transfers would effectively sanction the restart of a pipeline with a troubling history, without fully addressing critical financial, safety, and transparency issues.

In addition to the Appellee's concerns that Sable has not adequately met requirements for the transfer of permits, I would like to highlight several other highly relevant concerns to this issue:

- 1.
- 2.

3. Conflict with Climate Goals:

- 4. Restarting the pipeline would generate over 1,500 tons of CO2 daily, directly
- 5. undermining the county’s Climate Action Plan, which aims to reduce emission by 50% below 2018 levels by 2030. It would triple the county’s carbon footprint and hinder efforts to combat climate change. Our county is vulnerable to fires, floods, mudslides, and
- 6. other natural disasters that are exacerbated by climate change and it is in the public's best interest to invest in sustainable alternatives to fossil fuel, rather than lock us into decades more of pollution.
- 7.
- 8.
- 9.

10. Dangerous and polluting infrastructure:

- 11. Restarting the pipeline would resume operations of infrastructure that poses serious
- 12. environmental and public safety risks.

- 13.
- 14.
- 15.

16. Financial shortcomings:

- 17. Sable is financially unstable, operating at a significant deficit. In the event
- 18. of a spill, Sable's potential inability to cover cleanup costs would result in local taxpayers bearing the financial burden
- 19.
- 20.
- 21.

22. Historical precedent:

- 23. The 2015 Refugio Oil caused extensive environmental damage, disrupted local economies,
- 24. and cost taxpayers millions of dollars. A repeat of such a disaster is unacceptable.
- 25.
- 26.
- 27.

28. Frequent spill risk:

- 29. County analysis indicates the pipeline could spill every year, with a major rupture
- 30. occurring every four years. This is absolutely unacceptable for our local community, coastline, and ecosystems. Oil spills significantly affect our local economy by damaging valuable resources, reducing tourism, along with many more impacts.
- 31.

I respectfully urge the Board of Supervisors to support the appeal by denying the permit transfers until Sable can unequivocally demonstrate that all conditions have been met and that public safety, environmental integrity, and fiscal responsibility are assured.

In addition, I urge the Board of Supervisors to consider the serious concerns that outline the risk to environment, public health, and local economic stability. Restarting a pipeline with a problematic history while the world faces devastating climate impacts, and with our county being particularly vulnerable to climate impacts, would be devastating and heartbreaking.

Thank you for your attention to this matter and for considering the risks that have been clearly outlined.

Sincerely,

Kaytee Dobbs

--
Kaytee Dobbs

[LinkedIn](#)
University of California, Santa Barbara
kdobbs@ucsb.edu | (303) 941-5734

Sheila de la Guerra

From: David Hourin <davidhourin@gmail.com>
Sent: Monday, February 24, 2025 4:50 PM
To: sbcob
Subject: Sable Pipeline Ownership Public Comment - Approve the Appeal!

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.

Hello,

I wish to remain anonymous in my public comment. The Board of Supervisors absolutely must approve the appeal of the Las Flores Pipeline transfer of ownership. Sable cannot operate this pipeline responsibly.

The following investigative report from Hunterbrook Media explains exactly why Sable's operation of the pipeline will ensure environmental and economic disaster for Santa Barbara: <https://hntbrk.com/sable/>

Full text is below:

Sable Offshore (NYSE: \$SOC) is racing against the clock to relaunch an idle fossil fuel complex it bought from Exxon (NYSE: \$XOM) in February. Three oil and natural gas platforms, called the Santa Ynez Unit, have not produced fossil fuels since one of the pipelines carrying its oil ruptured in 2015. It was the biggest spill in California since 1990. After seven years, Exxon gave up trying to overcome the legal hurdles required to get Santa Ynez and the pipeline back online. Now, despite facing similar obstacles, Sable is telling shareholders it can restart production before October. Since Hunterbrook Media began reporting, Sable withdrew and refiled a key plan, likely increasing the risk of delays.

Based on Hunterbrook Media's reporting, Hunterbrook Capital is short \$SOC at the time of publication. Positions may change at any time after publication. This is not investment advice. See full disclaimer below.

Editorial Position:

Hunterbrook Media's Editorial Board believes that Sable Offshore will not restart production at Santa Ynez on time, if at all. Sable listed on NYSE via SPAC as \$SOC earlier this year. The company's auditors have since flagged Sable's ability to continue as a "going concern." Our Editorial Board agrees.

Exxon — a more well-capitalized and experienced company — spent seven years trying (and failing) to bring Santa Ynez back online. Sable's only apparent novel approach seems to be an attempt to bypass Santa Barbara County, which will likely only bring more scrutiny in California, a state not known as fossil fuel friendly.

The CEO's most recent prior company, Sable Permian Resources, went bankrupt. Before that, he flamed out from Freeport-McMoRan. Now, he and his repeat management team seem to be relying on a highly speculative gamble at the mercy of California regulators, litigators, and communities.

Due to this editorial opinion and with compliance review, Hunterbrook Media provided the article to its investment affiliate, Hunterbrook Capital.

Hunterbrook Media:

On May 19, 2015, oil flooded the Santa Barbara coast and spilled into the Pacific Ocean. An old pipeline carrying crude from the Santa Ynez platforms had ruptured, polluting 3,700 acres of beaches and fisheries. It was the largest oil spill in California since 1990.

On February 14, Sable Offshore Corp. acquired the platforms and pipeline from ExxonMobil Corp. — after the oil giant’s failed seven-year effort to restart the project.

Exxon abandoned its attempts to restart Santa Ynez earlier this year amid what it called “continuing challenges in the state regulatory environment,” leading the company to revise down the value of Santa Ynez by \$2.1 billion. Faced with the same roadblocks, Sable now aims to bring Santa Ynez online by October, just eight months after acquiring the assets.

The approval process involves multiple government bodies that all have to sign off on different steps of the restart plan. Exxon failed in part because, although it successfully obtained approval for the main safety design from the California Fire Marshal, Santa Barbara County denied related permits to carry out that design.

Sable’s strategy is to sidestep the county approval process by submitting a new design to the California Fire Marshal (Cal Fire) that Sable argues won’t require the County’s approval, according to the company’s security filings.

The County was not “made aware” of the company’s plan, the County said in response to Hunterbrook Media’s questions, adding that Cal Fire would need to approve any new filing from Sable “before seeking permits from the County.”

Sable told investors the Cal Fire review of the new design had been underway since December 2023 and slated for approval by April. But on March 8, the company withdrew the alternate plan, according to an email Cal Fire sent to Hunterbrook Media. On April 12, Sable told shareholders that it filed a new plan with the agency that still aims to avoid County review.

Sable did not respond to Hunterbrook Media’s inquiry on how it intends to comply with state law without receiving the County approval that prior operators sought.

Even if Sable wins Cal Fire’s approval of its new permit, it still needs regulatory sign-off on at least four other authorizations before it can restart its operations. That includes a separate approval from Santa Barbara County of the transfer of ownership from Exxon to Sable.

This figure represents the different permits necessary to restart the pipeline. The bubbles in the center represent individual permits and authorizations. The parenthetical text reflects the length of time it took for Exxon to obtain the respective permit. Figure made using Canva.

If Sable doesn't restart production by January 1, 2026, the Santa Ynez assets will revert back to Exxon "without any compensation to [Sable]," according to the terms of the deal.

Sable is led by Chief Executive James Flores, an oil and gas veteran who has had some struggles in the oil patch over the last decade.

In 2021, Flores formed a Special Purpose Acquisition Vehicle (SPAC) in pursuit of his next venture and quickly zeroed in on Exxon's Santa Ynez operations. When the deal closed with Exxon earlier this year, Sable Offshore debuted on the New York Stock Exchange. The Santa Ynez complex is its only asset.

Sable did not acknowledge receipt of Hunterbrook Media's requests for comment. Flores could not be reached for comment. Exxon declined to comment.

The pipeline that covered Refugio State Beach with oil
The ruptured pipeline spilled more than 120,000 gallons of oil.

Oil on Refugio State Park beach on May 19, 2015. Source: US Coast Guard
Federal investigators found that the owner and operator of the pipeline at the time of the spill, Plains All American Pipeline LP, failed to prevent and detect corrosion that led to the rupture. The investigation also found that Plains' monitoring systems, alarms, and response were inadequate and worsened the damage from the spill.

In 2018, a jury found Plains guilty of nine criminal counts for spilling oil into state waters, killing wildlife, and failing to alert authorities. The company later paid \$61 million in civil penalties to the state and federal governments and settled a lawsuit with coastal landowners and fishers for \$230 million.

A pelican covered in oil near Refugio Beach the day following the spill. With permission from: Michel Brewer

Legal and regulatory fallout casts a shadow over Sable plans
In the aftermath, California tightened regulations on fossil fuel operators — passing a law in 2015 requiring extensive upgrades to coastal pipelines. Plains also agreed to an additional layer of oversight after its 2020 settlement with the state and federal governments.

As the enhanced safety provisions came into effect, Plains tried to restart the pipelines and Exxon tried to restart the Santa Ynez platforms. In October 2022, Exxon bought the pipeline infrastructure from Plains.

Exxon's efforts to bring Santa Ynez online stalled last year when the company was unable to win approval for any of its three restart plans, which ranged from retrofitting the old pipes to receiving and shipping the oil onshore via truck.

In February, Sable bought the three offshore platforms, the processing facility, and offshore and onshore pipelines from Exxon for \$988 million, supported by a \$625 million loan from Exxon.

While Sable’s “management believes the Company has sufficient capital to maintain operations and complete the repairs necessary to restart production,” it also concedes in a security filing that due to the regulatory hurdles, “substantial doubt exists about the Company’s ability to continue as a going concern.”

A diagram of Santa Ynez and its associated infrastructure from a December 2023 Sable Offshore presentation (pg. 19) to investors

Regulatory maneuver to clear hurdles

Cal Fire is the agency responsible for implementing the state law following the 2015 rupture. Cal Fire also has the final sign-off for approving the pipeline restart pursuant to the conditions the government imposed on the pipeline in 2020.

Before granting its final approval for a restart, Cal Fire is to consider a number of permits including a “Risk Assessment and Implementation Plan.” For the risk assessment, Cal Fire’s task is to assess whether the best spill-prevention technology for the pipeline has been identified by the operator.

In 2022, Cal Fire approved Plains’ Risk Assessment, requiring the pipeline operator to add 16 safety valves to reduce the volume of a “worst case” scenario spill by 48%, according to security filings and the Risk Assessment document Hunterbrook Media obtained.

To move forward, however, the project also needed permission from Santa Barbara County to access the planned construction sites for the additional valves. The County denied Exxon on the grounds that the risk of another oil spill was too high even with the additional measures, citing the age and condition of the pipeline as a primary concern.

After an appeal, the County board last August deadlocked with a 2-2 vote on a motion to decide if it should revisit its denial. The Board has not considered the issue since, and “Sable has taken no action” to reinitiate its consideration, according to the County’s email to Hunterbrook Media.

While Sable says it may resume those efforts, the company is betting it can avoid the County altogether, seeking Cal Fire’s approval for a different Risk Assessment plan that Sable says “will not require Santa Barbara County zoning approval,” according to security filings.

Cal Fire would not provide a copy of the company’s filing, reasoning that the information was exempt from an open-record request submitted by Hunterbrook Media.

Novel attempt hits a snag

Sable had said it was expecting Cal Fire to promptly approve its pending permit. But on March 8, Sable withdrew the application, which was originally filed by Exxon, according to the agency’s response to Hunterbrook Media. Cal Fire said the law requires a new risk analysis be submitted when a company is sold.

Sable refiled its alternative plan on April 11 and maintains that the plan is still designed to avoid county-level zoning review.

It took Cal Fire 14 months to consider and approve the previous Risk Assessment plan for the project.

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Sable's ambitious timeline

Even if it bypasses the County's zoning board, Sable still needs Santa Barbara County to approve Exxon's transfer of ownership of the facilities to Sable.

Sable anticipated that its transfer conditions would "be fulfilled in whole or in large part by the same audit information provided" during Exxon's purchase of the assets, according to security filings.

Hunterbrook Media asked the County if its review of Sable will differ from its review of Exxon. In an email, the County said, "The County Board of Supervisors will review Sable's current Change of Owner/Operator applications on their merit, independent from its previous review of Exxon's applications."

Santa Barbara County received Sable's filings related to the transfer of ownership on March 25, according to the County's response to Hunterbrook Media.

"This transfer from Exxon to Sable is different from the Plains to Exxon transfer," Linda Krop, the chief counsel at local advocacy group the Environmental Defense Center, who has long opposed the restart of the pipeline and Santa Ynez platforms and was on the beach following the spill to monitor abatement efforts, told Hunterbrook Media.

"When Exxon filed the transfer of ownership we did raise concerns but the County approved the transfer based on Exxon's financial resources, one of the components the County reviews," Krop said. "But now that Exxon has sold to Sable, our concerns are much more serious and exacerbated by the fact that Sable wants to use the corroded, old pipeline."

"A new company who received most of its money from Exxon through a loan — it raises concerns about safety and the company's ability to respond to an incident," Krop said. "We will definitely be engaged in the County's consideration of the transfer. At a minimum, we will ask the County to thoroughly explore Sable's financials and safety plans."

Sable also needs approval from the California Public Utilities Commission's (CPUC) rate-setting regime, where the agency determines what the company can charge its pipeline customers. Sable says in its security filings that the outcome of these proceedings will determine whether they can "earn an adequate rate of return in a timely manner or at all."

There is no set timeline to a CPUC rate-setting proceeding, according to the agency's website. Sable has yet to file an application or advice letter with the CPUC to initiate its deliberation process, according to the agency's April 9 response to Hunterbrook Media.

CEO Flores gambles on the scraps

Flores became interested in Exxon's operations when he was operating four offshore platforms at Point Pedernales and Point Arguello up the coast from Santa Ynez in the early 2000s, according to Sable's security filings.

At the time, he was running Plains Exploration & Production Co. and Plains Resources Inc., upstream affiliates of Plains All American, the company responsible for the 2015 pipeline spill.

In 2013, mining giant Freeport bought Plains Exploration and McMoran Exploration.

Freeport retained Flores and appointed him co-chairman of the company's new \$9 billion oil and gas division, with Freeport's president and CEO, Richard Adkerson, telling shareholders he knew "Jim for over 20 years and admired his track record as an entrepreneur in the oil and gas business." After that, the timeline on Sable's investor presentations of the team's "History of Value Creation" stops:

In 2016, Freeport shuffled its management and replaced Flores, amid billions of dollars in losses and write-downs and a protracted exit from its expensive diversification attempt.

Flores' next, much smaller act, Sable Permian Resources, suffered a similar fate.

At Sable Permian, Flores and two private equity firms targeted the debt-laden assets of the late Aubrey McClendon, the former CEO of Chesapeake Energy and American Energy Partners. Flores took the helm of Sable Permian as CEO with the hope of paring debt and reducing expenses. After three years and a drop in oil prices, Sable Permian went bankrupt, laid off all its employees, and denied Flores' attempt at a high payout.

Tom Loughrey, who provides oil and gas data to institutional investors and worked on distressed credit analysis for the sector at Silverback Asset Management during Flores' time at Sable Permian, questioned the company's management in an interview with Hunterbrook Media.

"Sable Permian was poorly run. It was not a high-quality asset base to begin with and it was drilled horribly," he said. "Flores and his team drilled the wells way too densely. It was basically destroying the company for near term quarterly results. And that was back in the day when everyone thought no one would look at the data. It was very scammy."

Flores has brought a loyal cadre of operational managers from venture to venture; three Sable executives worked with Flores at each of his last three companies, plus his son, whose first leadership experience was at the Texas company.

Now, Sable's small team — with less capital and less experience than Exxon and Flores' earlier companies — is back in California to resuscitate an offshore platform just 35 miles away from the platforms Flores oversaw at Freeport.

A year before he left Freeport, Flores spoke to The Wall Street Journal about his philosophy in the oil patch during a low price environment. "It's raining and it's going to rain for a long time. We're all going to get wet. A few people are going to drown. You just have to make it to the other side," he said.