Summary of State Regulation of Crude Oil Pipelines in Santa Barbara County

January 13, 2025

Sable Offshore Corporation is attempting to restart the Santa Ynez Unit oil and gas operation in Santa Barbara County. The Santa Ynez Unit includes three offshore platforms in federal waters connected to shore by offshore pipelines, onshore pipelines, the Ellwood Pier, mooring buoys, and the Las Flores Canyon Processing Facility. The onshore pipelines include pipelines identified as CA-324 and CA-325 that were responsible for the 2015 Refugio Oil Spill.

This summary outlines the many state agencies that oversee the Santa Ynez Unit operations, including oil pipeline construction, maintenance and operations, which would need to approve various actions to allow these pipelines to restart. This summary has been assembled to build public understanding of the regulatory processes over these pipelines.

Overview

California's lands and offshore waters have hosted significant crude oil extraction for well over a century. Since the mid-1980s, however, crude oil extraction has declined each year largely due to decreasing levels of easily accessible crude oil.

Today, the state has three active crude oil/petroleum extraction platforms off its coast in state waters and eight active platforms in federal waters. These platforms are connected to the shore via undersea pipelines that transport crude oil from the offshore platforms to onshore facilities that process the oil for sale. This oil is eventually transported to refineries to be converted into products such as gasoline and diesel fuel.

California state government enforces a broad set of laws and regulations over many aspects of crude oil infrastructure. This includes oversight of the extraction, transport, and refining of crude oil. These laws and regulations exist to protect public health and safety and to safeguard California's natural resources and environment.

Oversight By Agency

Multiple state agencies regulate the pipelines owned and operated (pipelines CA-324 and CA-325) by Sable Offshore Corporation in Santa Barbara County that the company is attempting to restart. Each of these state entities has specific authorities and obligations over these pipelines that is detailed in state law and discharges these responsibilities through regulatory and oversight processes.

The state entities with oversight over these pipelines include (in alphabetical order):

1. California Coastal Commission
2. California Department of Conservation, California Geologic Energy Management Division (CalGEM)

3. California Department of Fish and Wildlife (CDFW), including the Office of Spill Prevention and Response (OSPR)
4. California Department of Forestry and Fire Protection (CAL FIRE), Office of the State Fire Marshal (OSFM)
5. California Department of Parks and Recreation (State Parks)
6. Central Coast Regional Water Quality Control Board
7. Central Valley Regional Water Quality Control Board
8. State Lands Commission

These state entities, with the exception of the two regional Water Quality Control Boards, exist within the California Natural Resources Agency. The regional Water Boards fall under the umbrella of the California Environmental Protection Agency.

Below is a short summary of the referenced state entities with regulatory oversight over these pipelines.

CALIFORNIA COASTAL COMMISSION

Issues permits for approved development activity in coastal areas.

- FOCUS: Environmental protection and public access to state coastal areas.
- ROLE & AUTHORITY: Under the California Coastal Act of 1976, the California Coastal Commission has permitting responsibility for non-exempt pipeline work and other development associated with the pipeline in the Coastal Zone, including any enforcement actions for permitting requirements. The Commission also has federal consistency review authority under the Coastal Zone Management Act of certain pipeline-related activities in federal waters.
- ACTIONS UNDERWAY: Commission staff is coordinating with Sable (and Santa Barbara County, which shares the permitting jurisdiction) to determine what permits are needed and the appropriate permitting process. Commission enforcement staff are in the process of investigating multiple potential violations.
    - *On September 27, 2024*, Commission staff issued a Notice of Violation and cease and desist letter to Sable due to then recent and ongoing development activities that were occurring on and around the pipeline within the Coastal Zone without any Coastal Act authorization.
    - *On October 4, 2024,* Commission staff issued a Notice of Intent to issue an Executive Director Cease and Desist Order and requested confirmation that all work on the pipeline had ceased and that Sable would apply for a Coastal Development Permit for the work that had already occurred.
    - *On November 11, 2024,* the Commission's Executive Director issued a Cease and Desist Order to Sable, directing Sable, among other things, to submit an application for a Coastal Development Permit *"for any proposed future work to be undertaken along the Pipelines, as well as for after-the-fact ('ATF') authorization for unpermitted development that has already occurred."*
    - *Currently:* Coastal Commission staff are coordinating with Sable and the federal government to determine the scope of required federal consistency review. Federal

agency approvals would only occur after the Commission acts on the federal consistency review.

- FOR MORE INFORMATION: Contact the California Coastal Commission at ExecutiveStaff@coastal.ca.gov or the Commission's Public Information Officer at (415) 200-8052.

CALIFORNIA DEPARTMENT OF CONSERVATION: GEOLOGIC ENERGY MANAGEMENT DIVISION (CalGEM)

Oversees and regulates oil processing and production facilities.

- FOCUS: Public health and safety, environmental quality.
- ROLE & AUTHORITY: The Department of Conservation oversees compliance for oil production facility management. While the department has oversight of the Los Flores Canyon oil processing facility, CalGEM approval is not required prior to restarting the pipeline. CalGEM does, however, have a role in ensuring compliance with other regulatory partners in completing an oil spill plan, a pipeline management plan, various testing and maintenance requirements, bonding to cover decommissioning costs, and oversight of any potential oil production work happening near communities (called health protection zones).
- ACTIONS UNDERWAY:
    - *On December 17, 2024*, the Department of Conservation sent a letter to Sable notifying them of the need for an additional inspection of facilities, and production and bonding requirements.
- FOR MORE INFORMATION: Contact Department of Conversation Public Affairs at PAO@conservation.ca.gov or the Office of the Director at (916) 322-1080.

CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE/CDFW OFFICE OF SPILL PREVENTION AND RESPONSE

Manages natural resources for their ecological value and for public use.

- FOCUS: Protecting wildlife.
- ROLE & AUTHORITY: Exercises oversight as a landowner, as well as through its authority to protect fish and wildlife, and separately through one of its offices that oversees prevention, preparation for, and response to oil spills. CDFW-OSPR reviews and approves oil spill response plans and works to ensure that facilities have the financial resources necessary to cover the costs of oil spill scenarios. Under the Endangered Species Act and other Fish and Game Code laws, CDFW also oversees the review and approval process for evaluating impacts to wildlife due to altering the adjacent landscape.
- ACTIONS UNDERWAY:
    - *In October 2024*, CDFW-OSPR certified that Sable had the financial resources to cover the costs of a reasonable worst-case scenario oil spill.
    - *On November 22, 2024*, CDFW-OSPR sent a second notice to Sable sharing that its offshore contingency plan (C-Plan #CA-00-7239) was deficient. On December 20, 2024, Sable submitted corrections to its plan. CDFW-OSPR is reviewing these corrections and must respond by January 19, 2025.

- *On December 17, 2024*, CDFW-OSPR sent a third notice to Sable sharing that its onshore contingency plan (C-Plan #CA-00-7217) was deficient. On January 9, 2025, Sable submitted corrections to its plan. CDFW-OSPR is reviewing these corrections and must respond by February 9, 2025.
- *On December 17, 2024,* CDFW also issued a notice of violation for Fish and Game Code violations. This notice requests that Sable discontinue any work on CDFW properties and contact CDFW to discuss remedial measures and other actions to address impacts.

- FOR MORE INFORMATION: Contact Department of Fish and Wildlife Public Information Officer at Steve.Gonzalez@wildlife.ca.gov or (916) 804-1714.

CALIFORNIA DEPARTMENT OF FORESTRY AND FIRE PROTECTION (CAL FIRE): OFFICE OF THE STATE FIRE MARSHAL

Oversees and regulates the safety and operation of intrastate pipelines moving hazardous liquid in California.

- FOCUS: Protecting public safety and spill prevention.
- ROLE & AUTHORITY: With other regulatory partners, inspects, regulates, and oversees the overall safety of hazardous liquid pipelines. Prior to restarting any pipeline, the State Fire Marshal must approve a thorough list of requirements and regulations, including Sable's proposed plans for using technology to minimize oil spill impacts, a detailed risk analysis, safety compliance reports, pipeline integrity evaluations, field verifications and maintenance plans, start-up and safety inspection plans, and waiver applications proving equal or greater levels of safety than required regulations.
- ACTIONS UNDERWAY:
  - CAL FIRE Office of the State Fire Marshal approved a risk analysis and implementation plan for Sable's use of best available technologies in 2021.
  - *On December 17, 2024*, OSFM submitted waivers for federal review.
  - All remaining oversight items listed above remain open and must be completed prior to restarting the pipeline.

FOR MORE INFORMATION: Contact CAL FIRE Communications at calfire.dutypio@fire.ca.gov or (916) 651-FIRE (3473).

CALIFORNIA DEPARTMENT OF PARKS AND RECREATION

Protects and manages California state park land in areas where onshore pipelines are located.

- FOCUS: Environmental protection, state-owned land stewardship.
- ROLE & AUTHORITY: The California Department of Parks and Recreation manages public land for public benefits in areas where onshore pipelines may cross. The Department may grant easements for pipelines on this property. Specifically, this would include an easement to accommodate a four-mile section for pipeline maintenance in Gaviota State Park. The previous 30-year easement expired in 2016. Since then, the Department has issued individual permits for accessing and maintaining the pipeline.

- ACTIONS UNDERWAY:
    - *On December 20, 2024*, the Department of Parks and Recreation sent a letter to Sable requesting a full project description to evaluate their request for an easement.
- FOR MORE INFORMATION: Contact Department of Parks and Recreation Communications at newsroom@parks.ca.gov or (916) 654-7538.

CENTRAL COAST AND CENTRAL VALLEY REGIONAL WATER QUALITY CONTROL BOARDS
Protects the state's waterways and drinking water.

- FOCUS: Water quality and environmental public health.
- ROLE & AUTHORITY: The Central Coast and Central Valley Regional Water Quality Control Boards oversee water resources for the State of California within their respective jurisdictions, implementing the Clean Water Act and the Porter-Cologne Water Quality Control Act. The Regional Water Boards regulate the discharge of waste, such as sediment, that could occur during pipeline repair or construction. This includes issuing permits for dredging and land disturbances, and discharges of waste and stormwater.
- ACTIONS UNDERWAY:
    - *On December 13, 2024*, following an inspection, the Central Coast Regional Water Quality Board issued violation and non-compliance notices for unauthorized waste discharge into Santa Barbara County waterways, as well as a directive to seek permit coverage. Sable must take corrective action, submit a waste discharge report, and apply for appropriate permits.
- FOR MORE INFORMATION: Contact the State Water Resources Control Board at opa@waterboards.ca.gov or (916) 341-5252.

STATE LANDS COMMISSION
Oversees and approves leases for offshore pipelines, piers, and buoys.

- FOCUS: Safety of offshore pipelines to shore, spill prevention, environmental protection.
- ROLE & AUTHORITY: Under the Public Resources Code, the State Lands Commission must review and approve assignment of leases from the current owner (ExxonMobile) to Sable for offshore pipelines from federal platforms to shore, piers, and mooring buoys. Per this role and overview, Sable could restart the pipelines only if the terms and requirements of the current lease and operating agreements are met. This includes Sable performing detailed inspections of the pipeline line (in-line inspections), pressure testing (called hydrotesting), and using remotely operated vehicles to monitor the pipeline.
- ACTIONS UNDERWAY:
    - Ongoing review of assignment of leases as of December 20, 2024, with the most recent discussion at the State Lands Commission on December 17, 2024.
- FOR MORE INFORMATION: Contact the State Lands Commission External Affairs at ExternalAffairsChief.Public@slc.ca.gov or (916) 574-1992.

State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Office of Spill Prevention and Response
P.O. Box 944209
Sacramento, CA 94244-2090
Telephone: (916) 327-9943
www.wildlife.ca.gov/ospr

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director

September 27, 2024

Sable Offshore Corporation
Patrice Surmeier
1200 Calle Real
Goleta, CA 93117

Dear Ms. Surmeier:

An oil spill contingency plan for Sable Offshore Corporation's Pacific Region was submitted to the Office of Spill Prevention and Response (OSPR) for review and approval on 06/24/2024. Per the acknowledgment letter sent on 06/07/2024, OSPR assigned the contingency plan number CA-00-7239.

OSPR has conducted a full review of the contingency plan for compliance with Title 14, California Code of Regulations (14 CCR) § 817.02. The review identified deficiencies that must be corrected before a final approval can be issued. In accordance with 14 CCR § 816.03 (a)(3), the deficiencies and required corrective actions are described in the attachment accompanying this letter. Questions concerning these deficiencies can be directed to Andrew Jebananthan at facilitycplans@wildlife.ca.gov.

This letter serves as a notice of deficiency for plan CA-00-7239. In accordance with 14 CCR § 816.03 (f)(2), corrective action must be taken within 30 calendar days of the date of receipt of this letter, or by **10/27/2024**.

If a new or modified contingency plan is not submitted by this date, the contingency plan may be denied or revoked, and OSPR may order operations to be discontinued in any location where operations could impact waters of the state. Continued operations without an approved contingency plan could subject Sable Offshore Corporation to criminal, civil, or administrative penalties, pursuant to California Government Code § 8670.64(c), 8670.66(b), or 8670.67(b).

Although deficiencies have been identified, Sable Offshore Corporation is expected to follow the current version of plan if there is a spill and as indicated in the acknowledgment letter must comply with exercise requirements pursuant to 14 CCR § 820.1.

When you are ready to submit an updated contingency plan that addresses all deficiencies described in the attachment, please contact facilitycplans@wildlife.ca.gov to arrange for submittal of the plan for further review and approval.

Sincerely,

Chief of Preparedness
Office of Spill Prevention and Response
Department of Fish and Wildlife

CC: D. Reinhard, RCPU Supervisor, FRT Supervisor

CA-00-7239 Review Deficiencies and Corrections Needed

Need to correct the links in the plan to the LA/LB ACP. Also, include links to the Annex C of the ACP.
LA/LB ACP: https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=225127&inline
Annex C: https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=222498&inline

1. (E) The California Certificate of Financial Responsibility (COFR) number for the marine facility shall be included in the front of the plan. If the COFR is not available when the plan is submitted because the marine facility is not yet operational, the COFR number must be provided as soon as it becomes available. The COFR number must be provided before the plan can be approved.

Please include the approved COFR's associated with this plan in the Cal-OSPR appendix. The COFR's are 4-2623-00-001 and 2-2623-00-001. Please include these or the appropriate COFR's that the plan has obtained from the COFR unit.

2. (4) Each plan shall identify and ensure by contract or other approved means a certified Spill Management Team, as described in subchapter 5 of this chapter. The certified spill management team shall be the appropriate tier classification pursuant to section 830.3 of subchapter 5.

Please include the SMT application number that was provided to Sable on the SMT application. That number is PH00141 and can be included near the TRG SMT contract on PDF pg. 406 or in the Cal-OSPR appendix on PDF pg. 530. The inclusion of the SMT application with the PH00141 number would satisfy the regulation.

3. (2) Each plan shall describe the marine facility site and surrounding area, including, where appropriate, the following information (note: where maps/diagrams are required they may be submitted on electronic media, in Portable Document Format (PDF)):
(C) seasonal hydrographic and climatic conditions including wind speed and direction, air and water temperature, local tides, prevailing currents, and any local visibility problems

The Cal-OSPR appendix states that Appendix H has information on seasonal hydrographic and climatic conditions. I was not able to locate that information in Appendix H or it wasn't stated clearly. Please label this information more explicitly or include this information in alignment with the above criteria listed above.

4. (b) Marine Facility Description
   (1) Each plan shall describe the marine facility's design and operations with specific attention to those areas from which an oil spill could occur. This description shall include, at a minimum, the following information:
      (A) a piping and instrumentation diagram, and a tank diagram including the location of pumps, valves, vents and lines; the number, and oil storage capacity of each structure covered under the plan and its age, design, construction and general condition; the range of oil products normally stored in each structure; the presence or absence of containment structures and equipment; and the location of mooring areas, oil transfer locations, control stations, safety equipment, drip pans and the drainage for drip pans;

      PDF pg. 383 has a large-scale overview map of the platforms and the pipeline. In accordance with the regulation, there needs to be a more detailed piping diagram that shows any block valves, pumps, or potentially any remote operated valves along the pipeline in greater detail. This may be able to look like a line diagram that shows these figures drawn with representations of valves, and other equipment shown by symbols and a legend.

5. (1) Risk and Hazard Analysis

(B) The chosen hazard evaluation method must be conducted in accordance with the

guidelines established by the American Institute of Chemical Engineers as published in the "Guidelines for Hazard Evaluation Procedures", second edition, copyright 1992, prepared for The Center For Chemical Process Safety.
2. The plan must include information that demonstrates to the Administrator that the analysis is appropriate to the marine facility and adequate according to the published procedures referenced in (B) above.
The Risk and Hazard Analysis will need to be updated to reflect the actual risk associated with the facility and the reasonable worst case spill. The table on PDF pg. 558 will need to be updated with the actual potential amounts of oil spilled. Also, the analysis as a whole will need to be amended when the risk increases due to the RWCS volume being increased. When this analysis changes, this will require change to the offsite consequence analysis and the trajectory mapping as well.

6. (4) Required Prevention Measures Each marine facility shall take all prevention measures to reduce or mitigate the potential hazards identified in the Risk and Hazard Analysis, and the potential impact those hazards pose to the resources at risk. Each plan shall include the following:

(A) schedules, methods and procedures for testing, maintaining and inspecting pipelines and other structures within or appurtenant to the marine facility that contain or handle oil which may impact marine waters if a failure occurs. Any information developed in compliance with Title 30 CFR, Part 250.153; Title 33 CFR, Part 154; Title 49 CFR, Part 195; and/or Title 5, Division 1, Part 1, Chapter 5.5, Sections 51010 through 51019.1 of the Government Code may be substituted for all or part of any comparable prevention measures required by this subsection.
This section needs to be more detailed and provide more explicit schedules, methods, and procedures for testing, maintenance, and inspections on pipelines. Section 6 does not provide any clear timelines regarding the criteria listed in the regulation. PDF pg. 146 states the emulsion pipeline system is monitored continuously, but are there any scheduled maintenance programs in place for the pipeline or associated detection systems?

7. (B) methods to reduce spills during transfer and storage operations, including overfill prevention measures and immediate spill containment provisions. Any information developed in compliance with Title 2, CCR, Division 3, Chapter 1, Article 5, Sections 2300-2407; Title 30 CFR, Part 250.154; and/or Title 33 CFR, Parts 154 and 156 may be substituted for all or part of any comparable prevention measures required by this subsection.

The plan mentions the SCADA system and high/low pressure alarms on the pipeline, but is there any spill containment near shore where the pipeline goes from subsea to onshore and in the processing facility on land?

8. (E) For offshore pipelines, the largest volume in barrels of the following calculation:

1. The pipeline system leak detection time, plus the shutdown response time, multiplied by the highest measured oil flow rate over the preceding 12-month period. For new pipelines, use the predicted oil flow rate. Add to this calculation the total volume of oil that would leak from the pipeline after it is shut in. This volume should be calculated by taking into account the effects of hydrostatic pressure, gravity, frictional wall forces, length of pipeline segment, tie-ins with other pipelines, and other factors.
Please make note of this section needing to change when the RWCS volume is increased to its real number. Specify loss during shutdown and the total volume that would leak after shut in. Table on PDF pg. 433 would be the number we are looking for regarding the column titled "Harmony". This would also need to change the page of calculations where the persistence and emulsification factors are located near PDF pg. 561.

9. (4) Each plan shall describe how the plan holder will provide emergency services before the arrival of local, state or federal authorities on the scene, including:

(B) procedures for emergency medical treatment and first aid;

Plan needs to describe how medical treatment or first aid will be provided before local EMS arrives. PDF pg. 34 has Santa Barbara County EMS listed but no procedures for medical treatment before they are notified.

10. (D) procedures to manage access to the spill response site and the designation of exclusion, decontamination and safe zones;

Plan needs to explain a procedure for setting up the various zones and managing access to the spill site. Decontamination is mentioned on PDF pg. 345 and on PDF pg. 503, but it doesn't outline any sort of procedure for setting those zones.

11. (7) Each plan shall describe the procedures to manage access to the spill response site, the designation of exclusion, decontamination and safe zones, and the decontamination of equipment and personnel during and after oil spill response operations, as required by the California Occupational Safety and Health Administration.

Same note as correction above, plan needs to explain procedure for setting up these zones and managing access to spill site.

12. (8) Prior to beginning spill response operations and/or clean up activities, a Site Safety Plan must be completed. Each site safety plan shall include information as required pursuant to Title 8, Section 5192(b)(4)(B) of the California Code of Regulations including, but not limited to, a written respiratory protection program, written personal protective equipment program, written health and safety training program, written confined space program and permit forms, direct reading instrument calibration logs, and written exposure monitoring program.

Please include verbiage to the section of the plan located on PDF pg. 5 that addresses the needed verbiage above regarding what a site safety plan shall include in accordance with the CA code of regulations.

13. (g) Notification Procedures
    (2) Immediate Notification Nothing in this section shall be construed as requiring notification before response.

    Please include this statement above that would satisfy this requirement.

Scientific Review Corrections

1. (c) Prevention Measures. Each plan shall address prevention measures in order to reduce the possibility of an oil spill occurring as a result of the operation of the marine facility. The prevention measures must eliminate or mitigate all the hazards identified in the Risk and Hazard Analysis.

(2)(A) a trajectory, or series of trajectories (for pipelines, etc.), to determine the potential direction, rate of flow and time of travel of the reasonable worst case oil spill from the facility to marine waters and to the shorelines, including shallow-water environments, that may be impacted. For purposes of this requirement, a trajectory or trajectories (projected for a minimum of 72 hours) that determine the outer perimeter of a spill, based on regional extremes of climate, tides, currents and wind with consideration to seasonal differences, shall be sufficient;

The map on PDF pg. 443 is mapped by probability but there is no indication that this is based on RWCS volume. The plan needs a trajectory accounting for the spill volume and for that volume to be indicated on the provided trajectory. We will need to see information included in the consequence analysis for any shoreline impact more closely associated with the pipeline in state waters as well.

2. (c)(3)(A) The map of environmentally sensitive sites shall include:
    1. shoreline types and associated marine resources
    2. the presence of migratory and resident marine bird and mammal migration routes, and breeding, nursery, stopover, haul-out, and population concentration areas by season;
    3. the presence of aquatic resources including marine fish, invertebrates, and plants including important spawning, migratory, nursery and foraging areas;
    4. the presence of natural terrestrial animal and plant resources in marine-associated environments;
    5. the presence of state or federally-listed rare, threatened or endangered species;
    6. the presence of commercial and recreational fisheries including aquaculture sites, kelp leases and other harvest areas.

    The plan needs to include a map that depicts the criteria listed above. With the pipeline in state waters that are coastal, there would presumably be mapping to show all of the environmentally sensitive sites to that area. Part of this requirement can be satisfied with the link to the ACP, but nowhere in the plan is there a map that shows any locations of these sites. The ACP links in the plan are also not functioning correctly so I have provided them at the top of this document. Please also include the link for the ACP Annex C that will help satisfy part of this regulation as well.
3. (c)(3)(B) The map of the locations of economically and culturally sensitive sites shall include:
    1. public beaches, parks, marinas, boat ramps and diving areas;
    2. industrial and drinking water intakes, power plants, salt pond intakes, and other similarly situated underwater structures;
    3. known historical and archaeological sites. If a plan holder has access to any confidential archaeological information, it must be submitted as a separate item and will be handled as confidential information as described in section 790.3 of chapter 1.
    4. areas of cultural or economic significance to Native Americans

    Need to include a map that specifically shows the criteria of this section more in relation to state waters and impacted resources. The above criteria should be identified and mapped for any areas that could be impacted by a spill from the pipeline. These criteria could be included in one of the maps already in the plan but would need added symbols to indicate each item. Also, the contact for the Native American Heritage Commission should be include in relation to items #3 and #4 above. This contact information could be placed somewhere in relation to a section that talks about risks such as section 11.

State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Office of Spill Prevention and Response
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www.wildlife.ca.gov/ospr

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director

October 24, 2024

Pacific Pipeline Company
Lance Yearwood
1200 Calle Real
Goleta, CA 93117

Dear Mr. Yearwood:

An oil spill contingency plan for Pacific Pipeline Company's Las Flores Canyon onshore pipeline was submitted to the Office of Spill Prevention and Response (OSPR) for review and approval on 04/09/2024. Per the acknowledgment letter sent on 04/16/2024, OSPR assigned the contingency plan number CA-00-7217.

OSPR conducted a full review of the contingency plan for compliance with Title 14, California Code of Regulations (14 CCR) § 817.02. The review identified deficiencies that were detailed in a letter sent to you on 08/30/24, and Pacific Pipeline Company was given a deadline of 09/30/24 to submit corrections. An updated contingency plan was submitted on 09/30/24. OSPR reviewed the modified contingency plan and identified additional deficiencies that must be corrected. In accordance with 14 CCR § 816.03 (a)(3), the additional deficiencies and required corrective actions are described in the attachment accompanying this letter. Questions concerning these deficiencies can be directed to Andrew Jebananthan at facilitycplans@wildlife.ca.gov.

This letter serves as a second notice of deficiency for plan CA-00-7217. In accordance with 14 CCR § 816.03 (f)(2), corrective action must be taken within 30 calendar days of the date of receipt of this letter, or by **11/23/24**.

If a new or modified contingency plan is not submitted by this date, the contingency plan may be denied or revoked, and OSPR may order operations to be discontinued in any location where operations could impact waters of the state. Continued operations without an approved contingency plan could subject Sable Offshore Corporation to criminal, civil, or administrative penalties, pursuant to California Government Code § 8670.64(c), 8670.66(b), or 8670.67(b).

Although deficiencies have been identified, Pacific Pipeline Company is expected to follow the current version of plan if there is a spill and as indicated in the acknowledgment letter must comply with exercise requirements pursuant to 14 CCR § 820.1.

When you are ready to submit an updated contingency plan that addresses all deficiencies described in the attachment, please contact facilitycplans@wildlife.ca.gov to arrange for submittal of the plan for further review and approval.

Sincerely,

Chief of Preparedness
Office of Spill Prevention and Response
Department of Fish and Wildlife

CC: RCPU Supervisor, FRT Supervisor

CA-00-7217 Review Deficiencies and Corrections Needed
Issued 10/24/2024

1. § 817.02(a)(1)(E) The California Certificate of Financial Responsibility (COFR) number for the marine facility shall be included in the front of the plan. If the COFR is not available when the plan is submitted because the marine facility is not yet operational, the COFR number must be provided as soon as it becomes available. The COFR number must be provided before the plan can be approved.

Sable/Pacific Pipeline Company has been issued revised COFRs, with details as follows:

COFR 2-2624-00-001
24" CA-324- Las Flores Pipeline (Las Flores Canyon to Gaviota)
RWCS: 1935 bbl

COFR 4-2624-00-001
Las Flores Pipeline System CA-325A/B- Las Flores Pipeline, Gaviota to Pentland
RWCS: 15,269 bbl

The reasonable worst-case spill (RWCS) volumes in the contingency plan must match the volumes on the COFRs. The volumes do not match, as the contingency plan lists a RWCS volume of 0 bbl. The contingency plan must include the RWCS parameters and calculations for each pipeline facility issued a COFR.

All corresponding details in the contingency plan, such as the Risk and Hazard and Offsite Consequence Analyses, and all response processes and details required by § 817.02, should be aligned with the RWCS volumes listed on the COFRs.

2. § 817.02(c)(1)(C) Each plan shall include a summary of the results of the risk and hazard analysis. The summary shall include the following:

   …

   3.an analysis of the potential oil discharges, including the size, frequency, cause, duration and location of all significant spills from the marine facility as a result of each major type of hazard identified;

   4.the control measures that will be used to mitigate or eliminate the hazards identified. The plan shall include timeframes for implementing any control measures that cannot be functional immediately; and

   5.a prediction of the potential oil spills that might still be expected to occur after any mitigating controls have been implemented.

This portion of the Risk and Hazard Analysis must be addressed in more depth and detail in section 15 of the plan. The above items must be clearly addressed with respect to the pipeline and potential spills related to the hazards identified in the “what-if” analysis based on a spill of the RWCS volume. Currently the Risk and Hazard Analysis and identified hazards are found throughout section 2 and section 15 of the plan. Please create a summary section that includes the results listed above in section 15 so that the information is located in one Risk and Hazard analysis section.

3. § 817.02(c)(2) Off-Site Consequence Analysis
   For the significant hazards identified in the Risk and Hazard Analysis required under this section, the marine facility shall conduct a trajectory analysis to determine the Off-Site Consequences of an oil spill. This analysis shall assume pessimistic water and air dispersion and other adverse environmental conditions such that the worst possible dispersion of the oil into the air or onto the water will be considered. This analysis is intended to be used as the basis for determining the areas and shoreline types for

which response strategies must be developed. Some of the information required in this subsection may be drawn from the appropriate Area Contingency Plans, completed by the U.S. Coast Guard, State Agencies, and Local Governments pursuant to the Oil Pollution Act of 1990. (Note: where maps/diagrams are required they may be submitted on electronic media, in Portable Document Format (PDF)). The analysis, which shall be summarized in the plan, shall include at least the following:

(A) a trajectory, or series of trajectories (for pipelines, etc.), to determine the potential direction, rate of flow and time of travel of the reasonable worst case oil spill from the facility to marine waters and to the shorelines, including shallow-water environments, that may be impacted. For purposes of this requirement, a trajectory or trajectories (projected for a minimum of 72 hours) that determine the outer perimeter of a spill, based on regional extremes of climate, tides, currents and wind with consideration to seasonal differences, shall be sufficient.

(B) for each probable shoreline that may be impacted, a discussion of the general toxicity effects and persistence of the discharge based on type of product; the effect of seasonal conditions on sensitivity of these areas; and an identification of which areas will be given priority attention if a spill occurs.

(3) Resources at Risk from Oil Spills

Based on the trajectory of the spilled oil as determined in the Off-Site Consequence Analysis, each plan shall identify the environmentally, economically and culturally sensitive sites that may be impacted. Each plan shall identify and provide a map of the locations of these areas. Some of the information required in this subsection may be drawn from the appropriate Area Contingency Plans, completed by the U.S. Coast Guard, State Agencies, and Local Governments pursuant to the Oil Pollution Act of 1990. (Note: where maps/diagrams are required they may be submitted on electronic media, in Portable Document Format (PDF)).

The inland trajectory for line CA-325B (PDF pg. 220) must be updated to correspond to the RWCS volume calculated in the plan and listed on the COFR. The subsequent Offsite Consequence and Risk Hazard Analyses and Resources at Risk must reflect the trajectory corresponding to the correct RWCS volume. Additionally, line CA-324 poses a risk to marine waters, but the plan does not include a trajectory for line CA-324. The plan must include a trajectory and corresponding Offsite Consequence and Risk Hazard Analyses and Resources for the CA-324 RWCS volume consistent with the volume calculated in the plan and listed on the COFR.

4. § 817.02(e)(4) Shoreline Clean-Up:

(A) Utilizing the equipment that must be under contract, each plan shall describe the methods that will be used to contain spilled oil and remove it from the environment. The equipment identified for a specific area must be appropriate for use in that area given the limitations of the bathymetry, geomorphology, shoreline types and other local environmental conditions. Additionally, the equipment identified shall be appropriate for use on the type of oil identified. The description shall include:

1. all shoreline clean-up procedures and oil diversion and pooling procedures for the close-to-shore environment. These procedures shall include, where appropriate, methods for carrying out response operations and clean-up strategies in shallow-water environments, as identified in the trajectory analysis conducted as part of the Off-site Consequence Analysis;
2. 2. methods for shoreside cleanup, including containment and removal of surface oil, subsurface oil and oiled debris and vegetation from all applicable shorelines, adjacent land and beach types.
3. 3. measures to be taken to minimize damage to the environment from land operations during a spill response, such as impacts to sensitive shoreline

habitat caused by heavy machinery or foot traffic.

The plan does not adequately describe the above items. The plan should include a link to the NOAA shoreline cleanup assessment manual in Section 5 where this topic is discussed (PDF pg. 77, 223-228). The plan must clearly state that this document will be referenced when planning for shoreline cleanup.
https://response.restoration.noaa.gov/sites/default/files/manual_shore_assess_aug2013.pdf

State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Office of Spill Prevention and Response
P.O. Box 944209
Sacramento, CA 94244-2090
Telephone: (916) 327-9943
www.wildlife.ca.gov/ospr

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director

November 22, 2024

Sable Offshore Corporation
Patrice Surmeier
12000 Calle Real
Goleta, CA 93117

Dear Patrice Surmeier:

On 09/27/2024, the Office of Spill Prevention and Response (OSPR) issued a deficiency letter regarding contingency plan CA-00-7239. An updated oil spill contingency plan for Sable Offshore Corporation's Pacific Region Oil Spill Response Plan was submitted to OSPR for review and approval on 10/24/2024.

OSPR has conducted a full review of the contingency plan for compliance with Title 14, California Code of Regulations (14 CCR) § 817.02. The review identified deficiencies that must be corrected before a final approval can be issued. In accordance with 14 CCR § 816.03 (a)(3), the deficiencies and required corrective actions are described in the attachment accompanying this letter. Questions concerning these deficiencies can be directed to Andrew Jebananthan at facilitycplans@wildlife.ca.gov.

This letter serves as a notice of deficiency for plan CA-00-7239. In accordance with 14 CCR § 816.03 (a)(4), a revised plan addressing the deficiencies must be submitted within 30 calendar days of the date of receipt of this letter, or by December 22, 2024.

If a new or revised contingency plan is not submitted by this date, the contingency plan may be denied or revoked. Sable Offshore Corporation cannot conduct operations that pose a risk of an oil spill into state waters without an approved contingency plan. If a revised plan is not timely submitted for review, OSPR may impose daily administrative penalties for continued operations or order cessation of operations in any location where operations could impact waters of the state, pursuant to California Government Code § 8670.67(b) and 8670.69.4. Continued operations without an approved contingency plan could also subject Sable Offshore Corporation to civil or criminal enforcement actions, pursuant to Government Code § 8670.64(c) and 8670.66(b).

Operators must maintain a level of readiness that will allow effective implementation of applicable contingency plans (Government Code § 8670.28.5). Although deficiencies have been identified, Sable Offshore Corporation is expected to follow the current version of plan if there is a spill and, as indicated in the acknowledgment letter, must comply with exercise requirements pursuant to 14 CCR § 820.1.

When you are ready to submit a revised contingency plan that addresses all deficiencies described in the attachment, please contact facilitycplans@wildlife.ca.gov to arrange for submittal of the plan for further review and approval.

Sincerely,

David Reinhard
Chief of Preparedness
Office of Spill Prevention and Response
Department of Fish and Wildlife

CA-00-7239 Second Review Deficiencies

1. *Risk and Hazard Analysis*

   § 817.02 (c)(1)(C) Each plan shall include a summary of the results of the risk and hazard analysis. The summary shall include the following:

   …

   3. an analysis of the potential oil discharges, including the size, frequency, cause, duration and location of all significant spills from the marine facility as a result of each major type of hazard identified.

   …

   5. a prediction of the potential oil spills that might still be expected to occur after any mitigating controls have been implemented.

The plan describes the risk and hazard analysis on PDF pg. 603-604. The table on PDF pg. 604 identifies the potential size of oil discharges from the various hazards, but it must also identify the frequency, duration, and location of these potential oil discharges in greater detail. Additionally, the plan must include an explanation of any other predicted potential oil spills that might occur after mitigating controls have been implemented. Please provide some verbiage in this section that fulfills this requirement.

State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Office of Spill Prevention and Response
P.O. Box 944209
Sacramento, CA 94244-2090
www.wildlife.ca.gov/ospr

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director

December 17, 2024

Pacific Pipeline Company
Lance Yearwood
1200 Calle Real
Goleta, CA 93117

Dear Mr. Yearwood:

A revised oil spill contingency plan for Pacific Pipeline Company's Las Flores Canyon onshore pipeline was submitted to the Office of Spill Prevention and Response (OSPR) under the plan number CA-00-7217 on 11/21/2024 for review and approval.

Previously, OSPR conducted a full review of the contingency plan that was submitted on 04/09/24 for compliance with Title 14, California Code of Regulations (14 CCR) § 817.02. The review identified deficiencies that were detailed in a letter sent to you on 10/24/24, and Pacific Pipeline Company was given a deadline of 11/23/24 to submit corrections. An updated contingency plan was submitted on 11/21/24. OSPR reviewed the modified contingency plan and identified remaining deficiencies that must be corrected. In accordance with 14 CCR § 816.03 (a)(3), the deficiencies and required corrective actions are described in the attachment accompanying this letter. Questions concerning these deficiencies can be directed to Andrew Jebananthan at facilitycplans@wildlife.ca.gov.

This letter serves as a third notice of deficiency for plan CA-00-7217. In accordance with 14 CCR § 816.03 (f)(2), corrective action must be taken within 30 calendar days of the date of receipt of this letter, or by **01/16/2025**.

If a new or modified contingency plan is not submitted by this date, the contingency plan may be denied or revoked, and OSPR may order operations to be discontinued in any location where operations could impact waters of the state. Continued operations without an approved contingency plan could subject Pacific Pipeline Company to criminal, civil, or administrative penalties, pursuant to California Government Code § 8670.64(c), 8670.66(b), or 8670.67(b).

Although deficiencies have been identified, Pacific Pipeline Company is expected to follow the current version of plan if there is a spill and as indicated in the acknowledgment letter must comply with exercise requirements pursuant to 14 CCR § 820.1.

When you are ready to submit an updated contingency plan that addresses all deficiencies described in the attachment, please contact facilitycplans@wildlife.ca.gov to arrange for submittal of the plan for further review and approval.

Sincerely,

David Reinhard
Chief of Preparedness
Office of Spill Prevention and Response
Department of Fish and Wildlife

CA-00-7217 Review Deficiencies and Corrections Needed
Issued 12/17/2024

1. *Risk and Hazard Analysis*

§ 817.02(c)(1)(C) Each plan shall include a summary of the results of the risk and hazard analysis. The summary shall include the following:

… 2. an inventory of the hazards identified, including the hazards that resulted in the historical spills;

3.an analysis of the potential oil discharges, including the size, frequency, cause, duration and location of all significant spills from the marine facility as a result of each major type of hazard identified;

4.the control measures that will be used to mitigate or eliminate the hazards identified. The plan shall include timeframes for implementing any control measures that cannot be functional immediately; and

5.a prediction of the potential oil spills that might still be expected to occur after any mitigating controls have been implemented.

This portion of the risk and hazard analysis must clearly address the above provisions in more depth and detail. The current risk and hazard analysis is related to a pipeline replacement project. However, the analysis must identify hazards associated with normal pipeline operations and discuss potential spills caused by the hazards identified in the analysis, including hazards resulting in historical spills. Currently, the risk and hazard analysis and identified hazards are found throughout section 2 and section 15 of the plan. Please create a summary section that includes the results listed above in section 15 so that the information is located in one risk and hazard analysis section that is appropriate to normal pipeline operations and adequately addresses the provisions listed above. Note that this deficiency was included in a previous deficiency letter dated 10/24/24. Revisions were made in response to the deficiency, but the revisions were not sufficient.

2. *Off-Site Consequence Analysis*

§ 817.02(c)(2)…For the significant hazards identified in the Risk and Hazard Analysis required under this section, the marine facility shall conduct a trajectory analysis to determine the Off-Site Consequences of an oil spill. This analysis shall assume pessimistic water and air dispersion and other adverse environmental conditions such that the worst possible dispersion of the oil into the air or onto the water will be considered. This analysis is intended to be used as the basis for determining the areas and shoreline types for which response strategies must be developed. Some of the information required in this subsection may be drawn from the appropriate Area Contingency Plans, completed by the U.S. Coast Guard, State Agencies, and Local Governments pursuant to the Oil Pollution Act of 1990. (Note: where maps/diagrams are required they may be submitted on electronic media, in Portable Document Format (PDF)). The analysis, which shall be summarized in the plan, shall include at least the following:

(A) a trajectory, or series of trajectories (for pipelines, etc.), to determine the potential direction, rate of flow and time of travel of the reasonable worst case oil spill from the facility to marine waters and to the shorelines, including shallow-water environments, that may be impacted. For purposes of this requirement, a trajectory or trajectories (projected for a minimum of 72 hours) that determine the outer perimeter of a spill, based on regional extremes of climate, tides, currents and wind with consideration to seasonal differences, shall be sufficient.

(B) for each probable shoreline that may be impacted, a discussion of the general toxicity effects and persistence of the discharge based on type of product; the effect of seasonal conditions on sensitivity of these areas; and an identification of

which areas will be given priority attention if a spill occurs.

(3) Resources at Risk from Oil Spills

Based on the trajectory of the spilled oil as determined in the Off-Site Consequence Analysis, each plan shall identify the environmentally, economically and culturally sensitive sites that may be impacted. Each plan shall identify and provide a map of the locations of these areas. Some of the information required in this subsection may be drawn from the appropriate Area Contingency Plans, completed by the U.S. Coast Guard, State Agencies, and Local Governments pursuant to the Oil Pollution Act of 1990. (Note: where maps/diagrams are required they may be submitted on electronic media, in Portable Document Format (PDF)).

The inland trajectory for line CA-325B (PDF pg. 220) must be updated to correspond to the RWCS volume calculated in the plan and listed on the COFR. The subsequent Offsite Consequence and Risk Hazard Analyses and Resources at Risk must reflect the trajectory corresponding to the correct RWCS volume. Additionally, line CA-324 poses a risk to marine waters, but the plan does not include a trajectory for line CA-324. The plan must include a trajectory and corresponding Offsite Consequence and Risk Hazard Analyses and Resources for the CA-324 RWCS volume consistent with the volume calculated in the plan and listed on the COFR. Please note that this deficiency was included in a previous deficiency letter dated 10/24/24, but this deficiency went unaddressed in the subsequent submission.

CA-00-7217 Sable Offshore Las Flores Canyon Plan Deficiencies

1.(D) a certification statement signed under penalty of perjury by an executive within the plan holder's management who is authorized to fully implement the oil spill contingency plan, who shall review the plan for accuracy, feasibility, and executability. If this executive does not have training, knowledge and experience in the area of oil spill prevention and response, the certification statement must also be signed by another individual within the plan holder's management structure who has the requisite training, knowledge, and experience. The certification shall be submitted according to the following format; "I certify, to the best of my knowledge and belief, under penalty of perjury under the laws of the State of California, that the information contained in this contingency plan is true and correct and that the plan is both feasible and executable."
The Certification statement on PDF pg. 127 needs a date near the signature. Please include current date for this signature page.

2.(E) The California Certificate of Financial Responsibility (COFR) number for the marine facility shall be included in the front of the plan. If the COFR is not available when the plan is submitted because the marine facility is not yet operational, the COFR number must be provided as soon as it becomes available. The COFR number must be provided before the plan can be approved.
Plan needs to include approved certificates of financial responsibility on PDF pg. 129.

3.(4) Each plan shall identify and ensure by contract or other approved means a certified Spill Management Team, as described in subchapter 5 of this chapter. The certified spill management team shall be the appropriate tier classification pursuant to section 830.3 of subchapter 5.
Plan needs to identify the certified spill management team application number and provide the signed contract page with the external spill management team provider. Please include the SMT application number PH-00141 and the signed TRG contract page for their SMT coverage for Sable.

4.(A) Each marine facility shall conduct a Risk and Hazard Analysis to identify the hazards associated with the operation of the facility, including: operator error, the use of the facility by various types of vessels, equipment failure, and external events likely to cause an oil spill. The owner/operator may use one or more of the hazard evaluation methods identified by the American Institute of Chemical Engineers, or an equivalent method, including, but not limited to:
1. What-if analysis;
2. Checklist analysis;
3. Preliminary hazard analysis;
4. Hazard and operability study;
5. Failure mode and effect analysis; or
6. Fault tree analysis.

The Risk and Hazard Analysis in the plan does not explain how the analysis was conducted. The regulations state that the analysis needs to follow and identify certain guidelines and methods for

hazard evaluation. Please reference our regs for the full Risk and Hazard Analysis breakdown and it is found in 817.02(c).

5.(2) Off-Site Consequence Analysis For the significant hazards identified in the Risk and Hazard Analysis required under this section, the marine facility shall conduct a trajectory analysis to determine the Off-Site Consequences of an oil spill. This analysis shall assume pessimistic water and air dispersion and other adverse environmental conditions such that the worst possible dispersion of the oil into the air or onto the water will be considered. This analysis is intended to be used as the basis for determining the areas and shoreline types for which response strategies must be developed. Some of the information required in this subsection may be drawn from the appropriate Area Contingency Plans, completed by the U.S. Coast Guard, State Agencies, and Local Governments pursuant to the Oil Pollution Act of 1990. (Note: where maps/diagrams are required they may be submitted on electronic media, in Portable Document Format (PDF)). The analysis, which shall be summarized in the plan, shall include at least the following:

(B) for each probable shoreline that may be impacted, a discussion of the general toxicity effects and persistence of the discharge based on type of product; the effect of seasonal conditions on sensitivity of these areas; and an identification of which areas will be given priority attention if a spill occurs.
(3) Resources at Risk from Oil Spills Based on the trajectory of the spilled oil as determined in the Off-Site Consequence Analysis, each plan shall identify the environmentally, economically and culturally sensitive sites that may be impacted. Each plan shall identify and provide a map of the locations of these areas. Some of the information required in this subsection may be drawn from the appropriate Area Contingency Plans, completed by the U.S. Coast Guard, State Agencies, and Local Governments pursuant to the Oil Pollution Act of 1990. (Note: where maps/diagrams are required they may be submitted on electronic media, in Portable Document Format (PDF)).

The plan references river crossings and has pages with descriptions but their needs to be mapping for these river crossings to better depict sensitive sites near these crossings. Also, the maps included in the off-site consequence analysis section need to identify the criteria of the consequence analysis more clearly. Linking to ACP can satisfy part of this need, but the maps provided on PDF pg. 284-287 need to identify various data more explicitly. The lightly colored areas are very broad and hard to read on some maps when trying to identify specific criteria that needs to be met from the regs such as the presence of migratory and resident marine bird and mammal migration routes or the presence of federally-listed rare, threatened, or endangered species.

6.Plan needs to update ACP links to the correct locations. Use this link for LA/LB ACP and state in the plan that the strategies found in the ACP will be used:
https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=170564&inline

7.Plan needs to include signed OSRO contract for Patriot Environmental Services since they are listed as one of the OSRO's on PDF pg. 123.