

1 **ALSTON & BIRD LLP**
JEFFREY D. DINTZER, SBN 139056
2 jeffrey.dintzer@alston.com
3 MATTHEW C. WICKERSHAM, SBN 241733
matt.wickersham@alston.com
4 350 South Grand Avenue, 51st Floor
Los Angeles, CA 90071-1410
5 Telephone: (213) 576-1000
Facsimile: (213) 576-1100
6

7 Attorneys for Plaintiffs
SABLE OFFSHORE CORP.; PACIFIC PIPELINE COMPANY
8

9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
10 **FOR THE COUNTY OF SANTA BARBARA**

11 SABLE OFFSHORE CORP., a Delaware
corporation;
12 PACIFIC PIPELINE COMPANY, a Delaware
corporation,
13
14 Plaintiffs,
15 v.
16 CALIFORNIA COASTAL COMMISSION, a
state agency; and DOES 1 through 25, inclusive,
17
18 Defendants.
19

Case No. 25CV00974

Assigned for all purposes to:
Hon. Thomas P. Andrele

**DECLARATION OF STEVE RUSCH IN
SUPPORT OF PLAINTIFFS' OPPOSITION
TO DEFENDANTS' *EX PARTE*
APPLICATION SEEKING A TEMPORARY
RESTRAINING ORDER TO ENFORCE THE
CEASE AND DESIST ORDER**

Complaint Filed: February 18, 2025
Trial Date: None set

1 Coastal Zone approximately 100 anomaly repairs, and the only work remaining includes
2 approximately twenty-two (22) additional anomaly repairs to the Las Flores Pipelines, which will
3 occur onshore in pre-disturbed areas along small sections of the Las Flores Pipelines. Of the
4 approximately twenty-two remaining repairs, eighteen (18) repairs will be conducted within Plaintiffs’
5 right of way provided by the California Department of Parks and Recreation within the Gaviota State
6 Park. Additionally, approximately four (4) repairs will be conducted within Plaintiffs’ right of entry
7 obtained from the Land Trust for the County of Santa Barbara. Plaintiffs’ remaining repair and
8 maintenance work will be completed in approximately six (6) weeks. A true and correct copy of a map
9 depicting Plaintiffs’ completed and outstanding repair and maintenance activities to the Las Flores
10 Pipelines is attached hereto as **Exhibit A**.

11 6. Plaintiffs currently have a right of entry to perform the repair and maintenance activities
12 from the California Department of Parks and Recreation, and Plaintiffs are negotiating a slightly
13 revised right of entry that is anticipated to be agreed upon following this TRO hearing. Plaintiffs
14 currently have a right of entry to the Land Trust for the County of Santa Barbara (“County”).

15 7. Plaintiffs are completing repair and maintenance activities pursuant to existing Coastal
16 Development Permits (“CDPs”) for the Las Flores Pipelines, which were permitted by the County, not
17 the Coastal Commission, under the County’s Local Coastal Program pursuant to its delegated authority
18 from the Coastal Commission.

19 8. Although the Coastal Commission alleges that irreparable harm will occur if a TRO is
20 not issued, the Coastal Commission’s allegations are baseless. All work is being conducted in the
21 disturbed pipeline corridor where all impacts were determined to be permanent for the lifetime of the
22 Las Flores Pipelines. In addition, for all ongoing work, Plaintiffs are implementing robust construction
23 best management practices, including conducting pre-construction biological resources surveys,
24 including nesting bird surveys, ensuring that a biologist is available onsite to monitor work, and
25 conducting environmental awareness training with all onsite personnel, to ensure that impacts to
26 coastal resources would fall within the scope of impacts previously analyzed during the Las Flores
27 Pipelines’ environmental review, authorized under the CDPs, and approved by the County.

28 9. If a TRO is issued, Plaintiffs will greatly suffer irreparable harm.

1 10. Specifically, Plaintiffs have spent approximately \$45 million on its repair and
2 maintenance activities occurring within the Coastal Zone through March 2025. Plaintiffs are required
3 to meet specific deadlines in order to thereafter conduct operations at the Pipelines, which is critical
4 to the livelihood of Plaintiffs' business.

5 11. If a TRO is issued, Plaintiffs will be forced to shut down repair and maintenance
6 activities, which will require Plaintiffs to incur significant economic damages. Plaintiffs will be forced
7 to absorb costs amounting to approximately \$423,100 per day, or approximately \$2,500,000 per week
8 broken down as follows:

- 9 a. \$160,000 per day for 40 workers, comprising of 8 work crews and 5 men per work
10 crew;
- 11 b. \$21,600 per day for 12 welders and welder assistants;
- 12 c. \$48,000 per day for 15 workers performing valve work, underground battery array
13 work, and fencing activities;
- 14 d. \$20,000 per day for 10 pipeline inspectors and company field representatives;
- 15 e. \$10,000 per day for 4 workers performing non-destructive evaluations;
- 16 f. \$7,500 per day for 5 on-site biologists;
- 17 g. \$32,000 per day for 10 workers maintaining workable conditions at repair sites;
- 18 h. \$4,000 per day for a spider hoe excavator operator;
- 19 i. \$20,000 per day for \$200 per day of per diem for 100 workers;
- 20 j. \$100,000 per day for rental equipment and materials.

21 12. If a TRO is issued suspending repair and maintenance activities, Plaintiffs will be
22 forced to lay off approximately 75 workers.

23 13. A true and correct copy of photographs depicting before, during, and after Plaintiffs'
24 repair and maintenance activities to the Las Flores Pipelines is attached hereto as **Exhibit B**.

25 ///

26 **Authorization for Repair and Maintenance to the Las Flores Pipelines**

27 14. The Las Flores Pipelines includes the pipeline segments CA-324 ("Line CA-324")
28 (previously known as Line 901) and CA-325 ("Line CA-325") (previously known as Line 903)

1 (collectively referred herein as the “Las Flores Pipelines”), portions of which are located within the
2 coastal zone in an unincorporated area of the County of Santa Barbara (“County”). Line CA-324 is
3 designed to transport crude oil approximately 10.9 miles from Las Flores Pump Station in Las Flores
4 Canyon, west along the Gaviota Coast, to the existing Gaviota Pump Station located approximately
5 one mile east of Gaviota State Park in Santa Barbara County. Line CA-325 is designed to transport
6 crude oil approximately 113.5 miles north from the Gaviota Pump Station to the Sisquoc Pump Station,
7 then east through the Los Padres National Forest and Cuyama Valley, ultimately delivering crude oil
8 to the existing Pentland Delivery Point in the San Joaquin Valley in Kern County. Lines CA-324 and
9 CA-325, are located onshore, and carry a maximum permitted throughput capacity of 150,000-barrels
10 of crude oil per day and 300,000-barrels of crude oil per day, respectively. The Celeron Pipeline
11 Project (also referred to herein as the “Pipeline Project”), includes Lines CA-324 and CA-325.

12 15. The State Lands Commission and federal Bureau of Land Management and Department
13 of the Interior prepared a joint Environmental Impact Report and Environmental Impact Statement
14 (“EIR/EIS”) for the Pipeline Project pursuant to California Environmental Quality Act (“CEQA”) and
15 National Environmental Policy Act (“NEPA”). During the Pipeline Project’s environmental review
16 under the CEQA and NEPA, the locations of Lines CA-324 and CA-325 were identified as an
17 environmentally superior alignment to minimize impacts to environmental resources (including
18 topography, viewshed, watersheds, etc.). The State Lands Commission certified the EIR/EIS in
19 January 1985.

20 16. After reviewing the EIR/EIS, the Santa Barbara County Planning Commission made a
21 final decision to approve the Pipeline Project FDP on February 18, 1986. The approval was not
22 challenged during the appeal period and the Planning Commission’s approval action became final and
23 effective. The Planning Commission’s action included the FDP (Case # 85-DP-66cz) and a Major
24 CUP (Case # 83-CP-97cz). The FDP was required because the Pipeline Project necessitated
25 comprehensive review, and the CUP was required because the pipelines crossed environmentally
26 sensitive habitat areas.

27 17. Consistent with the FDP approval and pursuant to the County’s certified LCP, the
28 County issued Coastal Development Permit CDP 86-CDP-189 for the Pipeline Project on July 27,

1 1986.

2 18. CDP 86-CDP-189 approved “[c]learing, grading and trenching activities for [the]
3 Celeron Pipeline Project as approved by 85-DP-66cz.” The CDP incorporated “[t]he project
4 description, pipeline route, conditions and plans required pursuant to those conditions described by
5 the approved Final Development Plan 85-DP-66cz.” CDP 86-CDP-189 also excluded “all activities
6 related to pumpstations, river crossings, pipe stringing, welding, and any other activities not normally
7 performed by the clearing, grading and trenching construction crews.”

8 19. On August 5, 1986, the County issued Coastal Development Permit CDP 86-CDP-205
9 for the “[r]emainder of all construction activities for the Celeron Pipeline [P]roject as approved by 85-
10 DP-66cz.” CDP 86-CDP-205 also incorporated “[t]he project description, pipeline route, conditions
11 and plans required pursuant to those conditions described by the approved Final Development Plan
12 85-DP-66cz.”

13 20. The CDPs were not appealed by any party, including the Coastal Commission. The
14 CDPs are therefore final, valid, and not subject to further appeal. Accordingly, the Conditions of
15 Approval for the Las Flores Pipelines’ FDP, CUP, and CDPs are all governed under the same
16 Conditions of Approval found in Case #85-DP-66cz, as amended by the County.

17 21. The County has amended the Conditions of Approval from time to time, and as such
18 identifies the Conditions of Approval with reference to each of the following case numbers: 88-DPF-
19 033 (RV01)z, 88-CP-60 (RV01), 88-DPF-25cz, 85 DP-66cz, and 88DP-25cz. Although the County
20 has issued separate CDPs for major pipeline improvements such as relocations and realignments since
21 the Las Flores Pipelines’ CDPs were first issued, the County has not required new or amended CDPs
22 for the anomaly work and all of the enumerated conditions relevant to the anomaly repairs at issue and
23 have remained unaltered.

24 22. The Pipeline Project’s EIR/EIS explains that its impact analysis extends through the
25 pipelines’ entire lifetime, including both pipeline “operation” and “maintenance” and specifically
26 acknowledges that routine maintenance activities, including the anomaly repair work, would occur
27 during the pipelines’ ongoing operation.

28 23. The Pipeline Project’s EIR/EIS incorporates into the Pipeline Project’s project

1 description certain Oil Spill Contingency and Emergency Response Plans that address ongoing
2 pipeline maintenance activities. The EIR/EIS concludes that compliance with these plans would
3 “substantially reduce the oil spill risk” and reduce any significant impacts that would result from a
4 major oil spill, including impacts related to soils, surface water, aquatic biology, and land use and
5 recreation. The County’s Statement of Overriding Considerations also concluded that compliance
6 with these plans, identified mitigation measures, and the Conditions of Approval would “mitigate[] as
7 completely as possible” all “potential oil spill impacts” and other potentially significant impacts
8 resulting from the Pipeline Project. These plans (which were directly attached to the Draft EIR/EIS
9 and were available for public review and comment) acknowledged the pipelines’ ongoing inspection
10 requirements, including by using inspection pipeline integrity gauges (“PIGs”) to “measure the
11 severity of corrosion and to inspect pipeline defects.” If required, identified pipeline defects (i.e.,
12 anomalies), once detected, would be repaired, “cleaned and recoated” or “removed and replaced,” and
13 “faulty ... sections of pipe would be replaced as necessary.

14 24. The Pipeline Project’s EIR/EIS imposes no limitation on the number of sites where
15 anomaly repairs may be undertaken at any one time or over the Las Flores Pipelines’ lifetime, and
16 thus, anomaly pipeline repairs contemplated under the Pipeline Project’s EIR/EIS for the Las Flores
17 Pipelines may be undertaken where such work is necessary at the same time or over a condensed
18 period without constituting a new project under CEQA.

19 25. Additionally, the Las Flores Pipelines’ Conditions of Approval, which were
20 incorporated by reference into the Las Flores Pipelines’ FDP, CUP, and CDPs, encompassed the same
21 operational and maintenance components of the Pipeline Project as described in the Pipeline Project’s
22 EIR/EIS, and thus, specifically contemplated and approved ongoing repair and maintenance activities,
23 including the anomaly repair work. For example, Condition J-11 acknowledges that the pipelines’
24 right-of-way will be used for “operational maintenance” after construction is completed. Further,
25 Condition P-2 contemplates that the pipeline operator will conduct “regular maintenance and safety
26 inspections,” “corrosion monitoring and leak detection,” and “periodic safety audits. Condition P-2
27 also acknowledges that federal regulations require the Pipelines’ operator to undertake certain repair
28 and maintenance activities such as the anomaly repair work at issue. The County later amended this

1 Condition in 1987 to expressly state that “[p]ermits may not be withheld or suspended due to County
2 concerns which are under the jurisdiction of 49 CFR Part 195 (Transportation of Hazardous Liquids
3 by Pipeline), with the exception of areas/issues agreed to by the permittee and the County.” Condition
4 P-2 confirms that required repair and maintenance activities like the anomaly repair work would be
5 undertaken pursuant to the Las Flores Pipelines’ Conditions of Approval, FDP, and CDPs rather than
6 requiring new or modified permits. As described above, the County’s Statement of Overriding
7 Considerations concluded that the Pipelines operator’s compliance with Condition P-2 and other
8 Conditions of Approval would “mitigate[] as completely as possible” all “potential oil spill impacts”
9 and other potentially significant impacts resulting from the Pipeline Project.

10 26. The Conditions of Approval contemplate that biological impacts within the Las Flores
11 Pipelines’ operational right-of-way would be permanent, allowing for ongoing repair and maintenance
12 activities like the anomaly repair work. For example, Condition H-1(j) originally required the pipeline
13 operator to develop a “plan for off-site reestablishment of oaks to mitigate impacts to oak savannahs
14 and woodlands along the route.”

15 27. The County later modified this condition to require the pipeline operator to endow an
16 Alternative Oak Mitigation Program to reestablish oak savannahs and woodlands in Santa Barbara
17 County at an off-site location to mitigate for the Project’s permanent on-site oak tree impacts.
18 Similarly, Conditions H-10 and H-11 required the pipeline operator to, after construction, replace and
19 revegetate any disturbed catalina mariposa lily and refugio manzanita in locations “in or near” the
20 disturbed area, but “exclusive of the operation [right-of-way].” Erosion control was the key objective
21 for any required revegetation along the pipelines’ operational right-of-way—not the long-term
22 reestablishment of sensitive species—because it was clearly understood that the pipeline’s right-of-
23 way would continue to be disturbed by pipeline operation and maintenance. These Conditions confirm
24 that any biological impacts along the pipelines’ operational right-of-way resulting from the anomaly
25 repair work are within the scope of impacts previously approved by the County.

26 28. The Conditions of Approval do not impose any limit or require new permits based on
27 the number of sites where anomaly repairs may be necessary or undertaken at the same time or over a
28 condensed period. Repair and maintenance activities, including the anomaly repair work, fail to trigger

1 any of the narrow circumstances under which the Conditions of Approval would require Sable to
2 obtain a new or modified permit. Condition A-13 provides:

3
4 [The pipeline operator] shall obtain a new or modified permit, or authority to continue
5 operation under the existing permit prior to undertaking any of the following activities
6 which may, in the judgement of the County, result in significant changes to the impacts
7 on the County. Such changes could include but not be limited to 1) major pipeline or
8 pump station modifications; 2) major changes in pipeline throughput; 3) introduction
9 of production to the pipeline from sources other than those described above [noted as
the outer continental shelf and other locally produced onshore and offshore petroleum
from the Santa Barbara and Santa Maria Basins], and 4) introduction of a different
product from any source.

10 29. The anomaly repair work falls within the scope of approved repair and maintenance
11 activities contemplated by the pipelines' Conditions of Approval, and as analyzed under the Pipeline
12 Project's EIR/EIS, to be undertaken without any subsequent or modified permit or subsequent
13 environmental review because the work does not involve: (1) "major pipeline or pump station
14 modifications," as the anomaly repair work is a standard repair and maintenance activity required by
15 49 C.F.R. § 195.452(h)(1); (2) "major changes in pipeline throughput," because the anomaly repair
16 work will not alter the pipelines' capacity; (3) "introduction of production ... from [new] sources"; or
17 (4) "introduction of a different product."

18 **The County's Confirmations that the Repair and Maintenance Is Already Authorized**

19 30. On February 12, 2025, the County confirmed in a letter to Sable that the future and
20 ongoing anomaly repair work conducted by Plaintiffs to the Las Flores Pipelines is "authorized by the
21 existing permits (Final Development Plan, Major Conditional Use Permit, and associated Coastal
22 Development Permits) and was analyzed in the prior Environmental Impact Report/Environmental
23 Impact Statement. Thus, no further application to or action by the County is required." The County
24 reached its conclusion after review of detailed descriptions, plans, and assessments provided to the
25 County by Sable included in Zoning Clearance applications submitted to the County concerning future
26 and ongoing anomaly repair work in the coastal zone. The County's letter further confirms that it is
27 "not appealable to the Planning Commission [or] Board of Supervisors." Although Sable's Zoning
28 Clearance applications allowed the County to confirm that ongoing and future anomaly repair work

1 falls within the scope of the Pipeline Project’s existing CDPs, the County also concluded that such
2 work does not actually require Zoning Clearances. As the County explained, its “assessment is
3 consistent with the type of reviews conducted by the County, both inside and outside the Coastal Zone,
4 on a regular basis to determine whether proposed development activities fall within the scope of
5 existing permits.” Therefore, based on its review the County concluded that “no further application to
6 or action by the County is required.” This reflects a County understanding that Zoning Clearances
7 should be used before commencing initial construction approved under a final development plan and
8 that Zoning Clearances should not be used for each individual element of the approved development
9 or use throughout the life of a project. Accordingly, the County offered to return the Zoning Clearance
10 applications without taking any action on them other than confirming “that the pipeline anomaly repair
11 work is authorized by the existing permits.” A true and correct copy of the County’s February 12,
12 2025 Correspondence to Plaintiffs is attached hereto as **Exhibit C**.

13 31. On March 6, 2025, SCS Engineers, on behalf of Plaintiffs, submitted “information
14 regarding 48 anomaly repairs previously conducted on portions of the [Las Flores Pipelines] [], and in
15 one County right-of-way....” On March 21, 2025, the County confirmed that it had “reviewed the
16 information [Plaintiffs] provided and [] determined that this work fits within[] the
17 conclusions/directives of our February 12, 2025 letter to Steve Rusch []. No permits will be required
18 [for the previous anomaly repair work to the Las Flores Pipelines].” A true and correct copy of the
19 exchange of correspondence with the County staff’s regarding prior repair and maintenance work
20 performed in 2024 is attached hereto as **Exhibit D**.

21 32. On April 9, 2025, the County sent the Coastal Commission a correspondence
22 addressing the County’s determination that the repair and maintenance activities to the Las Flores
23 Pipelines were authorized under existing CDPs. In its correspondence, the County noted that the
24 Coastal Commission claimed “that the County has ‘failed to provide the requested information
25 regarding the basis for the County staff’s determination.’” The County explained, “[p]lease note that
26 we have provided all requested documents in response to Coastal Commission inquiries[,]” and
27 explained that “Commission staff has all the information that the County considered prior to
28 concluding that the pipeline anomaly repair work identified in the February 12, 2025 letter is

1 authorized by the existing permits and was analyzed in the prior environmental review.” The County’s
2 April 9, 2025 correspondence further provides that, “[t]he County did not allow activity without a
3 permit, nor did the County take an action on a permit or development application that may be
4 appealable to the Coastal Commission.” A true and correct copy of the County’s April 9, 2025
5 correspondence is attached hereto as **Exhibit E**.

6 33. On February 8, 1988, the Las Flores Pipelines’ original proponent, the Celeron Pipeline
7 Company of California (Celeron), and the County entered into a Settlement Agreement regarding the
8 County’s jurisdiction over certain project components. As part of the Settlement Agreement, the
9 County agreed that it was preempted from regulating the Las Flores Pipelines’ design, construction,
10 and operation covered under 49 C.F.R. Part 195. The Settlement Agreement also creates a
11 presumption of preemption where the activity is: (1) covered by 49 C.F.R. Part 195 (PHMSA’s
12 implementing regulations), (2) deals with the design, construction, or operation of the pipeline even if
13 not expressly specified under 49 C.F.R. Part 195, or (3) performed a foot or more below the ground
14 surface. The County reserved the authority, however, to confirm that the Las Flores Pipelines comply
15 with the Conditions of Approval, allowing the County to ensure that the Las Flores Pipelines were
16 constructed and operated consistent with the Pipeline Project’s EIR/EIS and original County
17 approvals, including the CDPs. The Settlement Agreement further details that the County lacks
18 authority, however, to require additional permits or authorizations for any work that is expressly or
19 impliedly covered 49 C.F.R. Part 195, related to pipeline design, construction, or operation, or is
20 performed a foot or more below the ground surface.

21 34. In 2015, the California Legislature enacted Assembly Bill 864 (“AB 864”), which
22 requires pipeline operators in environmentally sensitive areas to use best available technology
23 including, but not limited to, “leak detection technologies, automatic shut-off systems, or remote
24 controlled sectionalized block valves, or any combination of these technologies” to reduce the volume
25 of potential oil spills. AB 864 charged the Office of the State Fire Marshal (OSFM) with drafting its
26 implementing regulations and granted OSFM the exclusive authority to enforce them.

27 35. In April 2021, Plaintiffs’ predecessor-in-interest, Plains Pipeline, L.P. (“Plains”),
28 secured approval from OSFM to retrofit the Pipelines with 16 above-ground safety valves as required

1 under AB 864, including seven valves in the Coastal Zone. The proposal included both motor-
2 operated valves (“MOVs”), which are equipped with an electrical shut-off system connected to utility
3 lines or a solar power source, and check valves (“CHKs”), which involve an automatic shut-off system
4 with one-way flow closure.

5 36. Like Plaintiffs’ anomaly repair work, the Pipelines’ original environmental review
6 contemplated safety valve installation work, including the installation of 15 “block and check” valves
7 that operate in the same way as the MOVs and CHKs approved by OSFM in April 2021.

8 37. In December 2021, Plains submitted applications to the County for approval to
9 complete the safety valve installation work. As a result of litigation related to the County’s review of
10 those applications, Plaintiffs revised the proposal such that all safety valves would be installed
11 underground.

12 38. On August 30, 2024, Plaintiffs and the County also entered into a settlement agreement
13 in litigation regarding the safety valves on the Las Flores Pipelines. The August 30, 2024 settlement
14 agreement addresses Plaintiffs’ revised plan regarding proposed safety valves as well as additional
15 surveillance and response enhancements that will be added to the Las Flores Pipelines. In the August
16 30, 2024 settlement agreement, followed by a subsequent letter from the County on September 4,
17 2024, the County confirmed that “it does not have permit authority or jurisdiction over the sixteen (16)
18 safety valves and their ancillary equipment because they are safety valves required by state law [AB
19 864], related to the operation of an interstate pipeline, and one foot or more underground. [The
20 County] understands the [Las Flores Pipelines] remain[] subject to regulation by the Office of State
21 Fire Marshall and that [Plaintiffs] will be working closely with that office on installation and testing
22 of the safety valves, as well as implementing a number of integrity-related improvements required by
23 that office.” As the August 30, 2024 settlement agreement also details, State law AB 864 and the
24 Office of State Fire Marshall require installation of safety valves on the Las Flores Pipelines before
25 the Las Flores Pipelines may be restarted. Pursuant to a consent decree, the Office of the State Fire
26 Marshall holds authority over the restart of the Las Flores Pipelines, oversees installation and testing
27 of the safety valves and implementation of several integrity-related improvements before resumption
28 of production transportation through the Las Flores Pipelines may take place.

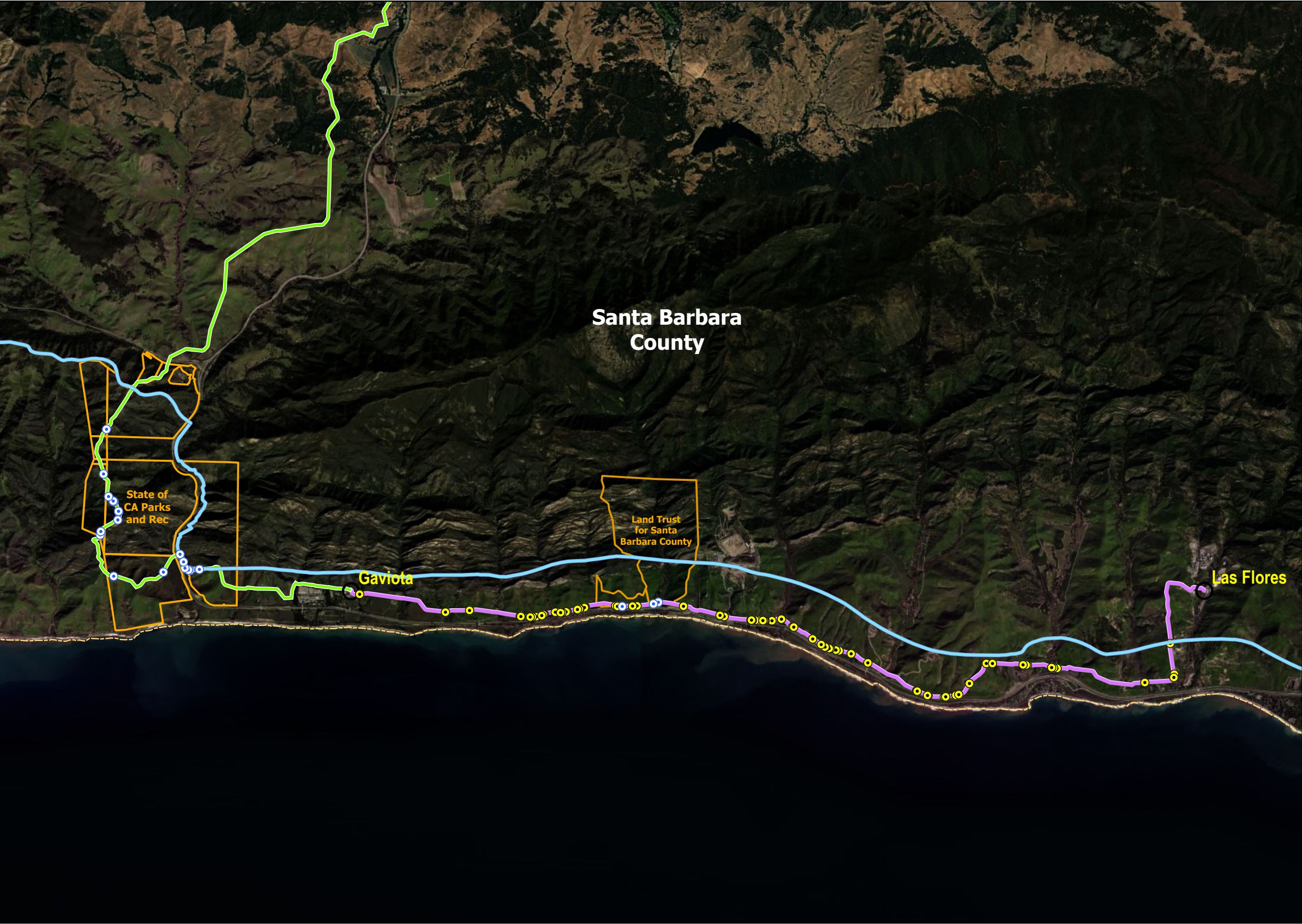
39. On September 4, 2024, in light of Plaintiff's revision to the proposed safety valve installation work, the County confirmed that the County "does not have permit authority or jurisdiction over the sixteen (16) safety valves and their ancillary equipment as currently proposed because they are safety valves required by state law [AB 864], related to the operation of a Pipeline, and one foot or more underground. Because the County has delegated LCP authority under the Coastal Act, Plaintiffs understood the County's confirmation to extend to Coastal Act permitting as well. Plaintiffs began the safety valve installation work only after receiving this confirmation that no further County authorization was required.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on April 16, 2025, in Thousand Oaks, California.


Steve Rusch

EXHIBIT A



SABLE
OFFSHORE

Las Flores Pipeline

- LFP Line 324
- LFP Line 325A
- Parcels
- Coastal Zone
- Completed Repair Sites
- Remaining Repair Sites
- Stations

N

W

E

S

0

0.33

0.65

1.3

Miles

EXHIBIT B

26986.46





☉ 93°E (T) ● 34°28'1"N, 120°6'12"W ±6ft ▲ 149ft



EXHIBIT C



Planning and Development

Lisa Plowman, Director
Jeff Wilson, Assistant Director
Elise Dale, Assistant Director

February 12, 2025

Mr. Steve Rusch
Sable Offshore Corporation/Pacific Pipeline Corporation
12000 Calle Real
Goleta, CA 93117

Sent via email: srusch@sableoffshore.com

SUBJECT: Zoning Clearance Applications - 24ZCI-00090, 24ZCI-00091, 24ZCI-00095, and 24ZCI-00096

Mr. Rusch,

On November 22, 2024 and December 6, 2024, Santa Barbara County Planning and Development received four Zoning Clearance applications for pipeline "anomaly repair work" to Lines 324 and 325a. These applications stated that they sought to permit anomaly repair work in the enclosed descriptions of work for case numbers 24ZCI-00090, 24ZCI-00091, 24ZCI-00095, and 24ZCI-00096. Sable's position is that the Zoning Clearance process meets the requirements of the County's Local Coastal Program because it is a means for the County to determine if the activities fall within an existing Coastal Development Permit or if a new Coastal Development Permit is required.

The County conducted a detailed review of pipeline permitting history and the Coastal Zoning Ordinance. Planning and Development concludes that this pipeline anomaly repair work is authorized by the existing permits (Final Development Plan, Major Conditional Use Permit, and associated Coastal Development Permits) and was analyzed in the prior Environmental Impact Report/Environmental Impact Statement (EIR/EIS). The County previously exercised its authority under its Local Coastal Program and delegated Coastal Act authority in approving the permits and the requested anomaly repair work is within the scope of those approved permits. (Pub. Resources Code § 30519.) The County's assessment is consistent with the type of reviews conducted by the County, both inside and outside the Coastal Zone, on a regular basis to determine whether proposed development activities fall within the scope of existing permits. Planning and Development will be returning the Zoning Clearance applications to Sable without taking action on them. Alternatively, Sable can choose to withdraw the applications.



This conclusion is related to the requested pipeline anomaly repair work in case numbers 24ZCI-00090, 24ZCI-00091, 24ZCI-00095, and 24ZCI-00096 and the information supplied with those applications and does not speak to permitting or jurisdiction on any other past or future work on or changes to the Pipeline and associated equipment.

This is not a: 1) permit exemption; 2) Director determination on the meaning or applicability of the provisions of the Coastal Zoning Ordinance; 3) decision on an application for a Coastal Development Permit; or 4) any other ground set forth in Article II Section 35-182. Rather, this letter confirms that the requested anomaly repair work was contemplated, analyzed, and approved in the existing Final Development Plan, Major Conditional Use Permit, associated Coastal Development Permits and certified EIR/EIS. Thus, no further application to or action by the County is required. This conclusion is not appealable to the Planning Commission, Board of Supervisors, or Coastal Commission and it does not require a Notice of Final Action. (Article II §§ 35-182; 35-181.4.)

Planning and Development encourages and requests that Sable continue to provide information to the County about any future anomaly repair work consistent with what was supplied in the above-referenced application. Such information will allow the County to evaluate whether particular anomaly repair work results in any different conclusions than those set forth in this letter. That information can be directed to my attention.

Sincerely,



Errin Briggs

Deputy Director, Energy, Minerals, Compliance & Cannabis Division

Enclosures: 24ZCI-00090 Description of Work
24ZCI-00091 Description of Work
24ZCI-00095 Description of Work
24ZCI-00096 Description of Work

CC: Mickey Johnson, ExxonMobil Upstream Company, via email
mickey.d.johnson@exxonmobil.com

24ZC1-00090 + 91

Zoning Clearance Applications for CA-324 Pipeline Routine Anomaly Repair Work – Description of Work

Scope of Work

In order to repair an anomaly, Sable must undertake the following steps: (1) excavate the site where an anomaly was detected, including the dirt beneath the affected pipeline segment, (2) expose the pipeline segment by removing insulation and sandblasting, (3) evaluate whether a “Composite Repair”¹ or “Cut-Out Repair”² is required, (4) conduct the Composite or Cut-Out Repair as appropriate, sandblast the repaired pipeline segment, and apply an epoxy coating, pipe tape, and rockguard wrap, (5) backfill the anomaly site, and (6) conduct final site cleanup, including revegetation activities (collectively, the “Anomaly Repair Work”).

Sable previously commenced the Anomaly Repair Work in compliance with Sable’s obligation under federal regulations to take “prompt action” to address pipeline anomalies. (See 49 C.F.R., § 195.452, subd. (h)(1).) On September 27, 2024, the California Coastal Commission issued Sable Notice of Violation V-9-24-0152 (“NOV”) and required Sable to immediately stop all Anomaly Repair Work. In accordance with the NOV, Sable stopped undertaking the Anomaly Repair Work. On November 12, 2024, Commission staff issued Executive Director Cease and Desist Order No. ED-24-CD-02 (“EDCDO”), which required Sable to submit an Interim Restoration Plan to secure and backfill the open anomaly sites without completing the Anomaly Repair Work. Commission staff approved Sable’s proposed Interim Restoration Plan on November 20, 2024 with respect to the remedial grading and BMP segment of the Interim Restoration Plan. As of November 21, 2024, Sable and Commission staff were continuing to coordinate regarding the hydroseeding segment of the plan. Consistent with the Interim Restoration Plan, each anomaly site will be backfilled and restored to original grade without completing the Anomaly Repair Work.

As such, Sable’s Zoning Clearance applications seek *both*:

1. After-the-fact Zoning Clearances for the Anomaly Repair Work previously undertaken at each anomaly site identified in the applications; and
2. Zoning Clearances to complete the Anomaly Repair Work at each such anomaly site in the future (including by excavating the anomaly site again after it is backfilled and restored in compliance with the EDCDO and Interim Restoration Plan).

¹ A “Composite Repair” involves wrapping the exposed pipeline segment in a composite material and allowing the material to cure.

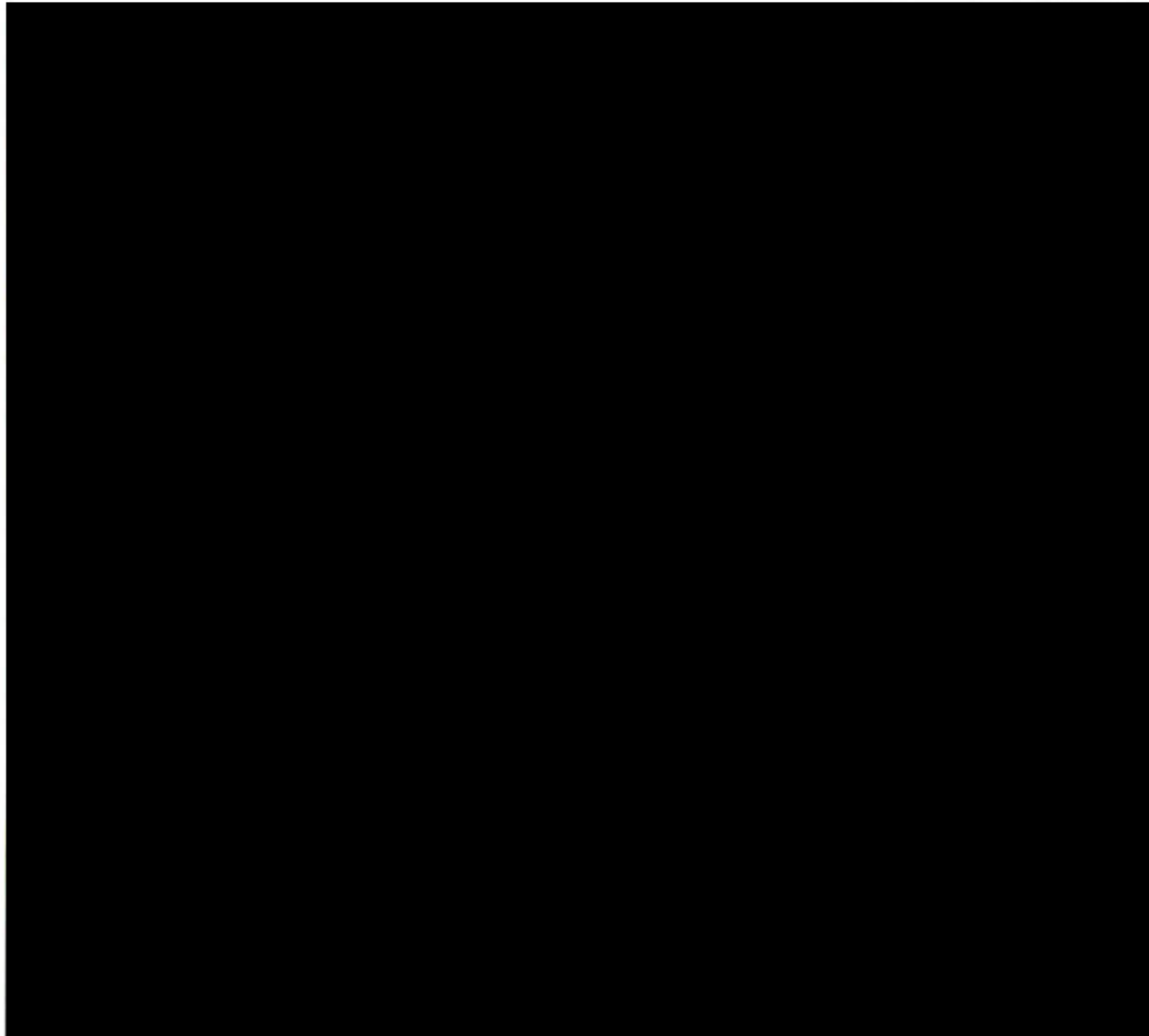
² A “Cut-Out Repair” involves cutting out and replacing the affected pipeline segment, welding the replaced pipeline segment in place, and X-raying the replaced pipeline segment to confirm successful replacement.

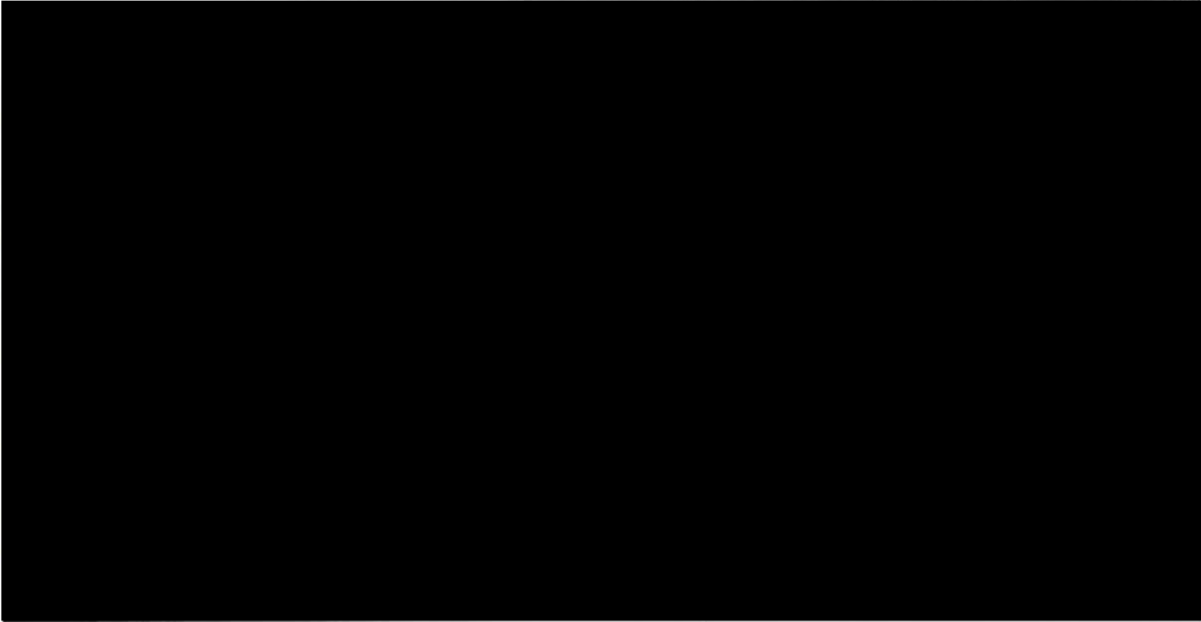
Location

45 anomaly sites require Anomaly Repair Work. As discussed above, these sites are located along existing pipeline CA-324 in APNs 081-140-019, 081-140-025, 081-150-002, 081-150-006, 081-150-007, 081-150-028, 081-150-032, 081-150-033, and 081-230-021. Table 1 details each anomaly site. Attachments C.1 and C.2 include overview and concentrated mapping depicting these sites.

Table 1. Anomaly Sites

Legend	
	Application #1
	Application #2





The proposed work would utilize the existing roads to access each site. No new roads will be constructed.

Construction & Equipment

Excavation depth would vary for each anomaly site based on unique factors, including the number of immediately proximate anomalies and site-specific requirements. All material will be balanced onsite, and no material will be imported or exported. Shoring boards will be utilized to stabilize the excavation walls prior to entry. Equipment needed to complete the Anomaly Repair Work includes the following:

- Excavator(s)
- Light and heavy-duty work trucks
- Air compressor(s)
- Welding machine(s)
- Bulldozer(s)
- Front loader(s) with back drag
- Backhoe
- Reachlift
- Water buffalo
- Water trucks

Fire Protection

If welding is required, Sable will provide a mowed work area within a minimum of 50 feet around the welding activities and maintain a fire watch at the location with 500 gallons of

water onsite, in addition to the fire extinguisher requirements of the Office of the State Fire Marshal (OSFM) and the Santa Barbara County Fire Department (SBCFD).

Construction Best Management Practices

In addition to the Construction Best Management Practices (BMPs) identified in Attachments D.1 and D.2, the following BMPs will be implemented to ensure potential effects on various environmental resources are avoided:

- Define limits of disturbance including the length/width of dig excavation trench, trench soil stockpile, equipment, staging, access, vehicle parking.
- Before construction activities commence, conduct pre-construction a biological resources survey to confirm the expected limits of work and minimal impact, or ensure that a biologist is onsite the first day of construction to monitor excavation to salvage and release any wildlife encountered.
- Before construction activities commence, conduct an environmental awareness training for all onsite personnel to discuss BMPs and other potential biological resources issues. While not expected in any of the dig sites, awareness of potential occurrence of special-status species should be discussed.
- All oak tree impacts are to be avoided including no vehicles, equipment, or stockpile within the drip line of any oaks.
- Stockpiles should be in uplands and avoid any stockpile, materials storage, vehicles, equipment, etc. in any drainage features or riparian habitat.
- Topsoil (the first 6" to 12" inches) removed for the excavation should be stockpiled separately for use in restoring original contours and grade, and to promote rapid plant growth restoration.
- The open trench should be safely fenced (hog wire, orange construction fence, or similar) at the end of each workday to exclude wildlife entrapment.

Conclusion

Sable is committed to designing, constructing, operating and maintaining Line CA-324 and CA-325 in a safe and reliable manner, and to meeting or exceeding applicable federal, state, and local regulatory standards.

24 201-00095 2, 96

**Zoning Clearance Applications for
CA-324 and CA-325A Pipeline Routine Anomaly Repair Work –
Description of Work**

Scope of Work

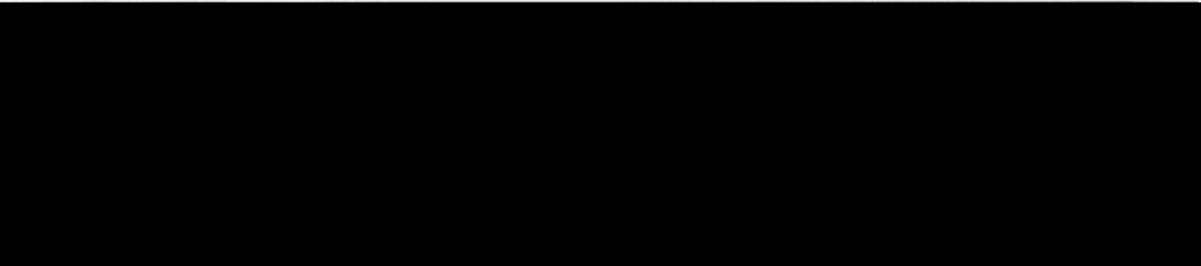
In order to repair an anomaly, Sable must undertake the following steps: (1) excavate the site where an anomaly was detected, including the dirt beneath the affected pipeline segment, (2) expose the pipeline segment by removing insulation and sandblasting, (3) evaluate whether a “Composite Repair”¹ or “Cut-Out Repair”² is required, (4) conduct the Composite or Cut-Out Repair as appropriate, sandblast the repaired pipeline segment, and apply an epoxy coating, pipe tape, and rockguard wrap, (5) backfill the anomaly site, and (6) conduct final site cleanup, including revegetation activities (collectively, the “Anomaly Repair Work”).

Location

28 anomaly sites require Anomaly Repair Work. As discussed above, these sites are located along existing pipeline CA-324 and CA-325A in APNs 081-130-068, 081-140-023, 081-150-002, 081-150-028, 081-150-032, 081-270-011, 083-590-003, 083-650-008, 083-650-009, and 083-650-011. Table 1 details each anomaly site. Attachments C.1 and C.2 include overview and concentrated mapping depicting these sites.

Table 1. Anomaly Sites

Legend	
	Application #1
	Application #2



¹ A “Composite Repair” involves wrapping the exposed pipeline segment in a composite material and allowing the material to cure.

² A “Cut-Out Repair” involves cutting out and replacing the affected pipeline segment, welding the replaced pipeline segment in place, and X-raying the replaced pipeline segment to confirm successful replacement.



The proposed work would utilize the existing roads to access each site. No new roads will be constructed.

Construction & Equipment

Excavation depth would vary for each anomaly site based on unique factors, including the number of immediately proximate anomalies and site-specific requirements. All material will be balanced onsite, and no material will be imported or exported. Shoring boards will be utilized to stabilize the excavation walls prior to entry. Equipment needed to complete the Anomaly Repair Work includes the following:

- Excavator(s)
- Light and heavy-duty work trucks
- Air compressor(s)
- Welding machine(s)
- Bulldozer(s)

³ F-9 is associated with two anomaly numbers from separate investigatory tool runs but is associated with one anomaly.

- Front loader(s) with back drag
- Backhoe
- Reachlift
- Water buffalo
- Water trucks

Fire Protection

If welding is required, Sable will provide a mowed work area within a minimum of 50 feet around the welding activities and maintain a fire watch at the location with 500 gallons of water onsite, in addition to the fire extinguisher requirements of the Office of the State Fire Marshal (OSFM) and the Santa Barbara County Fire Department (SBCFD).

Construction Best Management Practices

In addition to the Construction Best Management Practices (BMPs) identified in Attachments D.1 and D.2, the following BMPs will be implemented to ensure potential effects on various environmental resources are avoided:

- Define limits of disturbance including the length/width of dig excavation trench, trench soil stockpile, equipment, staging, access, vehicle parking.
- Before construction activities commence, conduct pre-construction a biological resources survey to confirm the expected limits of work and minimal impact, or ensure that a biologist is onsite the first day of construction to monitor excavation to salvage and release any wildlife encountered.
- Before construction activities commence, conduct an environmental awareness training for all onsite personnel to discuss BMPs and other potential biological resources issues. While not expected in any of the dig sites, awareness of potential occurrence of special-status species should be discussed.
- All oak tree impacts are to be avoided including no vehicles, equipment, or stockpile within the drip line of any oaks.
- Stockpiles should be in uplands and avoid any stockpile, materials storage, vehicles, equipment, etc. in any drainage features or riparian habitat.
- Topsoil (the first 6" to 12" inches) removed for the excavation should be stockpiled separately for use in restoring original contours and grade, and to promote rapid plant growth restoration.
- The open trench should be safely fenced (hog wire, orange construction fence, or similar) at the end of each workday to exclude wildlife entrapment.

Conclusion

Sable is committed to designing, constructing, operating and maintaining Line CA-324 and CA-325A in a safe and reliable manner, and to meeting or exceeding applicable federal, state, and local regulatory standards.

EXHIBIT D

Niz, Kim

From: Briggs, Errin <ebriggs@countyofsb.org>
Sent: Friday, March 21, 2025 10:52 AM
To: Thompson, James; Ybarra, Jacquelynn; Plowman, Lisa
Cc: Rusch, Steve; Yearwood, Lance; Surmeier, Patrice; Alcock, Lee; Lauren.Paull@lw.com
Subject: RE: Sable - Completed Anomaly Repairs
Attachments: Feb 12, 2025, Letter from Errin Briggs to Steve Rusch.pdf

CAUTION: External Sender

Hi James,

Thank you for the informational package regarding anomaly repair activities completed on Line 324 in 2024.

We have reviewed the information you provided and have determined that this work fits withing the conclusions/directives of our February 12, 2025 letter to Steve Rusch (attached). No permits will be required.

Thank you for the continued cooperation on these matters, we would appreciate if you could continue to provide similar information in advance for future projects of this type.

Sincerely,



Errin Briggs

Deputy Director, Energy Minerals & Compliance

Planning & Development

County of Santa Barbara

123 E. Anapamu St.

Santa Barbara, CA 93101

805-568-2047

ebriggs@countyofsb.org

<https://www.countyofsb.org/160/Planning-Development>

From: Thompson, James <JSThompson@scsengineers.com>
Sent: Thursday, March 6, 2025 11:34 AM
To: Briggs, Errin <ebriggs@countyofsb.org>; Ybarra, Jacquelynn <jybarra@countyofsb.org>
Cc: Rusch, Steve <srusch@sableoffshore.com>; Yearwood, Lance <lyearwood@sableoffshore.com>; Surmeier, Patrice <psurmeier@sableoffshore.com>; Alcock, Lee <lalcock@sableoffshore.com>; Lauren.Paull@lw.com
Subject: Sable - Completed Anomaly Repairs

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 Errin,

On behalf of Sable Offshore Corp. – Pacific Pipeline Company (Sable), SCS Engineers is providing information regarding 48 anomaly repairs previously conducted on portions of the existing pipeline CA-324 located on APNs 081-140-019, 081-140-025, 081-150-006, 081-150-028, 081-150-032, 081-150-033,

081-150-041, 081-150-042, 081-200-033, 081-210-047, 081-210-050, 081-210-051, 081-230-021, and in one County right-of-way not associated with an APN.

Please use the links below to download the cover letter and associated attachments. Let me know if you have any questions or comments.



[1 - Sable Completed Anomaly Cover Letter.pdf](#)
[\(113k\)](#)

[Completed Anomaly - Attachments.zip \(17M\)](#)

File links in this email will be active until April 5, 2025

Thanks,
James

James Thompson

Project Manager



316-250-1224 (cell)

661-606-6001 (office)

jsthompson@scsengineers.com

EXHIBIT E



Planning and Development

Lisa Plowman, Director

Jeff Wilson, Assistant Director

Elise Dale, Assistant Director

April 9, 2025

Mr. Cassidy Teufel
Deputy Director
California Coastal Commission
455 Market Street, Suite 300
San Francisco, CA 94105
Sent via email: Cassidy.Teufel@Coastal.ca.gov

SUBJECT: Sable Offshore Corp. – Authorization for Anomaly Repair Work

Dear Mr. Teufel,

The purpose of this letter is to respond to your April 7, 2025 letter to me which details your disagreement with our determinations regarding the ongoing anomaly repair work along Sable's Lines 324 and 325a located in the coastal zone.

In your April 7th letter you assert that the County has "failed to provide the requested information regarding the basis for County staff's determination." Please note that we have provided all requested documents in response to Coastal Commission inquiries.

- Initially, on September 9, 2024 and September 24, 2024, Celeron Pipeline Co. settlement-related documents were provided upon request to Cassidy Teufel, Wesley Horn and Jonathan Bishop.
- Following, in response to the Commission's request for the permit documents associated with the original construction of the pipelines, on December 10, 2024 a comprehensive set of printed permit history documents was provided to Wesley Horn in person.
- Then, a complete set of anomaly repair description documents were provided to Commission staff on February 24, 2025 in our letter to Cassidy Teufel.
- And finally, the most recent set of anomaly repair description documents were provided via email to Commission staff on March 24, 2025.

Commission staff has all of the information that the County considered prior to concluding that the pipeline anomaly repair work identified in the February 12, 2025 letter is authorized by the existing permits and was analyzed in the prior environmental review.



We understand the Coastal Commission has reached a different conclusion considering the provided documents, but the County continues to assert the dispute resolution process in Section 13569 is not applicable here because it only applies when: 1) the local government determines a project is exempt or categorically excluded; or 2) a decision on whether a proposal would be appealable to the Coastal Commission. The County did not allow activity without a permit, nor did the County take an action on a permit or development application that may be appealable to the Coastal Commission.

Best,

A handwritten signature in black ink, appearing to read 'Lisa Plowman', with a long horizontal flourish extending to the right.

Lisa Plowman
Director, Planning & Development

Enclosure: Letter from County to Cassidy Teufel dated February 12, 2025
Letter from County to Cassidy Teufel dated February 24, 2025

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

PROOF OF SERVICE

I, Garrett Stanton, declare:

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is Alston & Bird LLP, 333 South Hope Street, Sixteenth Floor, Los Angeles, CA 90071.

On April 16, 2025, I served the document **DECLARATION OF STEVE RUSCH IN SUPPORT OF PLAINTIFFS' OPPOSITION TO COASTAL COMMISSION'S EX PARTE APPLICATION FOR TEMPORARY RESTRAINING ORDER** on the interested parties in this action addressed as follows: See Attached Service List

☐ (BY U.S. MAIL) I am personally and readily familiar with the business practice of Alston & Bird LLP for collection and processing of correspondence for mailing with the United States Parcel Service, and I caused such envelope(s) with postage thereon fully prepaid to be placed in the United States Postal Service at Los Angeles, California.

☐ (BY MESSENGER SERVICE) by consigning the document(s) to an authorized courier and/or process server for hand delivery on this date.

☐ (BY FACSIMILE) I am personally and readily familiar with the business practice of Alston & Bird LLP for collection and processing of document(s) to be transmitted by facsimile and I caused such document(s) on this date to be transmitted by facsimile to the offices of addressee(s) at the numbers listed below.

☐ (BY OVERNIGHT MAIL) I am personally and readily familiar with the business practice of Alston & Bird LLP for collection and processing of correspondence for overnight delivery, and I caused such document(s) described herein to be deposited for delivery to a facility regularly maintained by Federal Express for overnight delivery.

☒ BY ELECTRONIC SERVICE on the date stated below, I caused the document(s) described above to be served electronically on the recipients designated on the Transaction Receipt pursuant to the parties' stipulation establishing the authorizing e-service of documents.

☒ I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on April 16, 2025, at Los Angeles, California.

/s/ Garrett Stanton

Garrett Stanton

SERVICE LIST

Wyatt Sloan-Tribe Isabella Langone Office of the Attorney General 300 S. Spring St., Ste 1702 Los Angeles, CA 90013-1256	ATTORNEYS FOR: California Coastal Commission Email: Wyatt.Sloan-Tribe@doj.ca.gov Isabella.Langone@doj.ca.gov
--	--