

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

March 13, 2025

(Updates in red)

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-1980's, 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 Oil 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 is in the process of investigating multiple potential violations, on permitting processes related to Sable's work along the pipeline. Commission staff continues to direct Sable to apply for a Coastal Development Permit to resolve Coastal Act violations that occurred both onshore and offshore.
 - 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."

- Sable temporarily ceased activities. The Cease and Desist Order expired on February 9, 2025. The deadline established in the Order for Sable to apply for a Coastal Development Permit expired on March 11, 2025. Sable has not filed an application.
- On February 18, 2025, Sable filed a complaint against the Commission in Santa Barbara Superior Court, challenging two Notices of Violation and the Executive Director Cease and Desist Order issued on November 11, 2024. Sable is seeking declaratory and injunctive relief and inverse condemnation damages.
- On February 11, 2025, Commission staff issued a Notice of Violation and cease and desist letter to Sable regarding unpermitted development activities which had taken place offshore, in state coastal waters. This letter directed Sable to cease any further unpermitted development activities and apply for after-the-fact authorization for those development activities already undertaken.
- Around February 14, 2025, Sable recommenced its activities, and on February 16, 2025, the Commission's Executive Director issued a second Executive Director Cease and Desist order addressing the unpermitted development activities Sable had recommenced onshore. This letter, among other things, directed Sable to, again, cease any further development activities at the onshore locations, and to apply for a Coastal Development Permit for both after-the-fact authorization for work previously undertaken at these locations and for proposed, future work. This Executive Director Cease and Desist Order also included notice of the Executive Director's intent to pursue a future Consent Cease and Desist Order from the Coastal Commission. Sable did not cease its activities or comply with the order. Coastal Commission staff continue to work with Sable to resolve violations and to direct Sable to apply for requisite Coastal Development Permits.
- ~~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](https://www.coastal.ca.gov/) 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 Conservation](#) 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.
 - **Additional corrections were submitted by Sable on December 20, 2024 and January 17, 2025. CDFW-OSPR has reviewed the plan and found no deficiencies.**
- *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.
 - **OSPR has reviewed the plan and found no deficiencies.**
- *On December 17, 2024*, CDFW also issued a notice of **potential** 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.
 - **CDFW is currently reviewing Sable's response to the notice of potential violation.**

- **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 (OSFM) 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.
 - *On February 11, 2025*, PHMSA provided its notification of non-objection.
 - *Sable has completed most of the required pipeline repairs, and OSFM has inspected the field work and is verifying records of those repairs.*
 - All remaining oversight items listed above, *including pressure testing of lines and Sable’s submission of an updated start-up plan, which OSFM must review and approve*, 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

Protecting and managing 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.

- The Department of Parks and Recreation is evaluating a request to perform maintenance anomaly digs and associated repair work along a four-mile section of pipeline on State Parks property.
- **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

Protecting the state's water ways 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 Control 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.
 - *On January 22, 2025*, the Central Coast Regional Water Quality Control Board issued Sable a directive to submit a technical report describing Sable's activities at all pipeline work locations and associated potential discharges to waterways. The technical report is due March 10, 2025.
 - *On January 31, 2025*, Sable submitted an application for waste discharge requirements for its work at one waterway location. The Central Coast Regional Water Quality Control Board has requested additional information from Sable to facilitate review of the application. Review of the application is ongoing.
 - *On March 4, 2025*, Sable submitted two applications for coverage under the statewide permit for stormwater discharges associated with construction and land disturbing activities. The applications are under review.
- **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.