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

January 28, 2026

(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 Santa Barbara County, which shares the permitting jurisdiction, 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 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, requesting that Sable cease and desist.
    - *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 12, 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 its onshore activities. The Cease and Desist Order expired on February 10, 2025. The deadline established in the Order for Sable to apply for a Coastal Development Permit expired on March 12, 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 12, 2024. Sable is seeking declaratory and injunctive relief and inverse condemnation damages.
    - *On February 11, 2025*, Commission staff issued a Notice of Violation letter to Sable regarding unpermitted development activities which had taken place offshore, in state coastal waters. This letter asked 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*, four days after the Executive Director Cease-and-Desist order had expired, Sable recommenced its onshore activities in the coastal zone, and *on February 18, 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 order, among other things, directed Sable to, again, cease any further development activities at the onshore locations. This Executive Director Cease and Desist Order also included notice of the Executive Director's intent to pursue a future Cease and Desist Order and other further enforcement actions from the Coastal Commission. Sable did not cease its activities or comply with the order.
    - On *April 10, 2025*, the Commission held a five-hour, noticed, public hearing, at the conclusion of which it issued Sable a Cease and Desist Order and Restoration Order and imposed an administrative penalty. The Cease and Desist Order required, among other things, that Sable cease operations until securing Coastal Act authorization or a formal, final exemption determination for any work it wished to pursue. It also required that Sable seek after-the-fact Coastal Act authorization for work already completed and prospective authorization for anticipated work. The administrative penalty requires Sable to pay approximately $18 million, with a potential reduction to approximately $15 million if Sable complies with the requirement to seek Coastal Act authorization and pursues the most expeditious permitting approach. Sable continued its work and did not apply for authorization under the Coastal Act.
    - *On April 16, 2025*, the Commission filed a cross-complaint and an application for a temporary restraining order (TRO) and preliminary injunction (PI) against Sable to enforce the April 10, 2025 Cease and Desist Order. That same day, Sable amended its complaint against the Commission to add a challenge to the Commission's April 10 actions.
    - *On April 17, 2025*, the trial court reversed its tentative ruling in favor of the Commission, denied the Commission's request for a TRO, and set a hearing for May 14, 2025, on an Order to Show Cause (OSC) why a PI should not issue.
    - *On April 21, 2025*, the Commission filed a notice of appeal of the denial of the TRO, and on April 22, 2025, the Commission filed a writ petition with the Court of Appeal seeking immediate injunctive relief.
    - *On May 6, 2025*, the trial court issued an order moving the OSC hearing to May 28, 2025, and requiring the parties to submit briefs by May 14, 2025, on the question of whether the trial court retains jurisdiction to consider the issuance of a PI at an OSC hearing, given the Commission's appeal and writ petition.

- *On May 15, 2025*, the Court of Appeal denied the Commission's April 22, 2025 request for a writ but confirmed that the trial court retained jurisdiction to act on the Commission's request for a PI, and the trial court denied the Commission's request to hold the OSC hearing on the Commission's request for a PI sooner than May 28, 2025, given the resolution of the jurisdictional issue.
- *On May 16, 2025*, the Commission filed a demurrer to several of the causes of action in Sable's First Amended Complaint.
- *On May 28, 2025*, the trial court granted the Commission's request for a PI and directed the Commission to submit a proposed order. After multiple rounds of objections to the Commission's proposed order from Sable, the court overruled the objections on June 9 and signed the order that the Commission had proposed on June 10.
- *On June 4, 2025*, the court held a case management conference and set the case (including both Sable's case against the Commission and the Commission's cross-complaint against Sable to enforce its orders) for trial in October 2025.
- *On June 13, 2025*, Sable filed a motion to stay the Cease-and-Desist Order that the Commission had issued on April 10 and that the court's preliminary injunction prohibits Sable from violating. Sable also filed a demurrer to the Commission's cross-complaint.
- *On June 18, 2025*, the trial court sustained the Commission's demurrer to one cause of action in Sable's complaint but overruled it with respect to the other causes of action.
- *On July 9, 2025,* the trial court held a hearing on the motion Sable filed on June 13, 2025, asking the court to stay the Commission's Cease-and-Desist Order. The court denied the motion.
- *On July 15, 2025*, Sable filed a petition with the Court of Appeal for a writ of supersedeas to stay the effectiveness of the preliminary injunction issued by the trial court.
- *On July 23, 2025*, the trial court overruled Sable's demurrer to the Commission's cross-complaint, granted the Commission's motion to bifurcate the case such that only Sable's petition for a writ of mandate would go to trial in October, and denied the Commission's motion for a protective order to preclude all post administrative hearing discovery.
- *On July 29, 2025*, Sable filed a petition for a writ of mandate with the Court of Appeal to overturn the trial court's July 9 ruling and stay the Commission's Cease-and-Desist Order.
- *On August 4, 2025*, the Court of Appeal denied both Sable's July 15 petition for a writ of supersedeas and its July 29 petition for a writ of mandate.
- On *October 15, 2025*, trial was held on Sable's first cause of action (petition for writ of mandate). The trial court ruled in favor of the Commission and against Sable, declining to issue the requested writ, rejecting Sable's challenges to the Commission's action, and upholding the Commission's April 10 orders and penalties. It also scheduled a hearing and case management conference for December 3 to resolve the remaining issues.
- *On November 5, 2025*, Sable filed three things with the Court of Appeal: (1) Sable's opening brief on its appeal of the preliminary injunction that the trial court granted on May 28 and issued on June 10; (2) a petition for a writ of mandate, asking the Court of Appeal to overturn the October 15 trial court decision; and (3) a motion to consolidate the prior two items.
- *On November 6, 2025*, the Commission filed a motion for judgment on the pleadings in the trial court, seeking to enforce its cross-complaint.

- On *November 24, 2025*, the Court of Appeal denied Sable's petition for a writ of mandate seeking to overturn the trial court's October 15 ruling, as well as Sable's request to consolidate that proceeding with its pending appeal of the preliminary injunction that the trial court granted on May 28 and issued on June 10.
- On *December 3, 2025*, the trial court denied the Commission's motion for judgment on the pleadings, granted Sable's motion for leave to file a second amended complaint, continued Sable's motion to compel discovery, and set a briefing schedule for the parties to address whether any of Sable's claims remain viable given the court's October 15 ruling, with a hearing set for January 21, 2026, which was subsequently continued to February 18, 2026.
- *On December 23, 2025,* following PHMSA's determination that Sable's lines CA-324 and CA-325 are interstate pipelines subject to PHMSA's regulatory jurisdiction, PHMSA's approval of Sable's Restart Plan, and PHMSA's approval of Emergency Special Permits for Sable, the Commission sent a letter to PHMSA, requesting review of the Restart Plan and Special Permit applications under Subpart D of the Coastal Zone Management Act (CZMA) to determine if the applications trigger federal consistency review as unlisted permits/licenses. The Commission is also reviewing PHMSA's jurisdiction determination to assess whether PHMSA must submit a consistency determination pursuant to Subpart C of the CZMA, which gives the Commission authority to review federal agency activities that have reasonably foreseeable effects on any coastal resource or use.
- *On January 8, 2026*, Sable filed its reply brief with the Court of Appeal, completing briefing on its appeal of the preliminary injunction that the trial court granted on May 28 and issued on June 10, 2025.

- 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 Las 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.
  - On *May 9, 2025,* the Department of Conservation sent a letter to Sable notifying them that a bond in the amount of $31.9 million must be filed and outlining additional production facility requirements.

- *On January 27, 2026*, the Department of Conservation sent a letter to Sable notifying them that the amount of the required bond has been adjusted to $57.2 million. The increased bond amount is based on additional information provided by Sable regarding the amount and type of production equipment at the Las Flores Canyon oil processing facility.

- 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 March 26, 2025*, following the completion of a formal review, CDFW OSPR issued an approval letter for the C-Plan and an updated COFR for #CA-00-7239.
  - *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 *March 26, 2025*, following the completion of a formal review, CDFW OSPR issued an approval letter for C-Plan #CA-00-7217
  - *On December 17, 2024,* CDFW also issued a notice of potential violation (NOPV) 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. Specifically, the NOPV explained that Sable appeared to have: (a) violated Fish and Game Code section 1602(a)(1) by failing to notify CDFW prior to undertaking activities subject to that section, as well as sections 5650 and 5652; and (b)

conducted work outside a 50-foot-wide pipeline easement on CDFW property. The NOPV requested Sable to discontinue any work on CDFW property inconsistent with the easement and to contact CDFW to discuss remedial measures and other actions to address impacts on fish and wildlife resources at the locations identified in the NOPV.

- Sable submitted three notifications to CDFW under Fish and Game Code section 1602(a)(1), all to complete remediation work at the locations identified in the notifications.
    - *On February 18, 2025*, CDFW received a notification (No. EPIMS-SBA-57481-R5) pertaining to Sable's previous work at Site 280.65.19 (Unnamed Drainage East of Baron Ranch). *On March 18, 2025*, CDFW notified Sable that its notification was complete and because the project would not substantially adversely affect an existing fish or wildlife resource, a streambed alteration agreement was not required.
    - *On March 13, 2025*, CDFW received a second notification (No. EPIMS-SBA-58088-R5) pertaining to the three locations in Santa Barbara County that CDFW identified in the NOPV: Sites R5-1, R5-2, and R5-3. *On April 14, 2025*, CDFW determined the notification was complete. CDFW also determined the work at the three locations identified in the notification will not substantially adversely affect an existing fish or wildlife resource, and therefore a streambed alteration agreement would not be needed for any of the work. CDFW explained this in a letter to Sable dated April 14, 2025.
    - *On March 4, 2025*, CDFW received a third notification (No. EPIMS-SLO-57972-R4) pertaining to the location that CDFW identified in the NOPV: Site R4-1.
        - *On April 3, 2025*, CDFW sent Sable a letter, explaining the third notification was incomplete. *On April 25, 2025*, Sable submitted additional information to CDFW in response to CDFW's April 3, 2025, letter.
        - *On May 27, 2025*, CDFW sent Sable a letter explaining the third notification with the additional information was complete. The letter also explained that CDFW will have until *July 28, 2025*, to submit to Sable a draft streambed alteration agreement for the work described in the notification if CDFW determines an agreement is needed.
        - *On July 25, 2025*, CDFW submitted to Sable a draft streambed alteration agreement for the work described in the third notification.
        - *On August 26, 2025*, Sable responded to the draft streambed alteration agreement, requesting minor changes.
        - *On September 5, 2025*, CDFW submitted a revised draft streambed alteration agreement to Sable that included the changes discussed between CDFW and Sable. If Sable signs the revised draft agreement and CDFW subsequently signs, it will become the final agreement.

- *On August 27, 2025*, CDFW received a fourth notification from Sable that included nine sites where Sable had previously completed work. None of the sites was included in CDFW's NOPV.
    - *On September 29, 2025*, CDFW deemed the notification complete. CDFW has until *December 1, 2025* to submit a draft streambed alteration agreement for each of the work sites if an agreement is needed.
    - On *December 1, 2025*, CDFW submitted a draft streambed alteration agreement to Sable that covers all nine work sites identified in Sable's fourth notification.
    - *On January 12 and 23, 2026*, CDFW met with Sable to discuss changes to the draft streambed alteration agreement proposed by Sable, as Fish and Game Code section 1603(a) requires.
- *On February 7, 2025*, one of Sable's contractors, SCS Engineers, requested a letter of permission from CDFW to access the Carrizo Plains Ecological Reserve to conduct work within a pipeline easement that precedes CDFW's ownership of the property. *On November 12, 2025*, CDFW granted permission.

- Sable Offshore Corp continues to maintain compliance with OSPR's exercise requirements for both the offshore (CA-00-7217) and onshore (CA-00-7239) contingency plans. Both of Sable Offshore Corp's plans are Tier 1, which has the greatest drill and exercise requirements. ~~There are two exercises scheduled for the remainder of the year:~~
    - CA-00-7217 – Offshore plan. Exercise is scheduled for 7/17/25.
        - 7/25/2024 Exercise. Received credit for multiple objectives
    - CA-00-7239 – Onshore plan. Exercise scheduled for 9/18/2025.
        - 9/18/2024 Exercise. Received credit for multiple objectives
    - Planned 2026 exercises:
        - 07/23/2026: CA-00-7217 Pacific Pipeline Company Las Flores Pipeline System
        - 09/10/2026: CA-00-7239 Sable Offshore Corp Las Flores Canyon Facility
- OSPR's contingency plan exercise program is outlined in Title 14, California Code of Regulations (CCR), Section 820.1. The program establishes exercise requirement tiers based upon plan holders largest Reasonable Worst-Case Spill (RWCS) volume.
    - For facilities, the regulations establish 10 objectives; objectives (1) and (2) must be successfully achieved annually. Any number of objectives (3) through (10) may be tested during an exercise, but over any consecutive three-year period all objectives in (3) through (10) must be tested and successfully achieved.

- 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. OSFM must verify records of those repairs. OSFM has completed two additional PHMSA-required inspections since August 15; both inspections resulted in minor recommended suggestions and no significant findings.
    - All remaining oversight items, including approving the pressure testing results 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. Following Sable's submission to OSFM of the final start-up plan, OSFM will review the plan and provide recommendations for approval or denial of the plan.
    - *On June 2, 2025*, Center for Biological Diversity and Environmental Defense Center separately moved ex parte for temporary restraining orders in Santa Barbara County Superior Court to prevent OSFM from issuing authorizations or proceeding with restart of the Las Flores Pipeline System. The Superior Court granted each petitioner's request for a temporary restraining order and the judge clarified from the bench that the orders would stop not just approval of the restart plan, but all activity by CAL FIRE relating to Lines 324 and 325. The court set a hearing on the requests for preliminary injunction for July 18, 2025.
    - *On July 18, 2025*, the court issued a preliminary injunction that allows OSFM to resume pipeline safety inspections on lines CA-324 and CA-325, as warranted. The court's order contained several other requirements, including that the restart of the Las Flores Pipelines would remain enjoined until 10 court days after Sable filed a notice with the court indicating that Sable had received all necessary approvals and permits for restart of the Las Flores Pipelines and that Sable intended to restart the lines. OSFM will continue to uphold the laws and the court orders related to this case as staff works to ensure actions taken by the operator to restart lines 324 and 325 meet all pipeline safety requirements under the purview of OSFM.

- *On September 11, 2025*, Sable submitted its updated restart plan to OSFM. These documents are currently under review by OSFM staff.
- *On October 22, 2025,* the State Fire Marshal sent a letter to Sable notifying the company of deficiencies in its compliance with the State Waivers, which prevent the restart of the pipelines. OSFM continues to review the restart plan submitted by Sable in September and reserves its rights to provide additional direction or comment as part of that review.
- *On December 17, 2025*, OSFM was notified that PHMSA determined Lines CA-324 & CA-325, operated by Sable Offshore Corp. in Santa Barbara County, are interstate pipelines and thus within PHMSA's federal jurisdiction. In its decision, PHMSA indicated that it would assume regulatory authority of the lines going forward.
- *On December 22, 2025,* OSFM was notified that PHMSA approved Sable's Restart Plan for Lines CA-324 & CA-325.
- *On December 23, 2025,* PHMSA issued Emergency Special Permits to Sable that allow alternative safety measures in lieu of compliance with regulations relating to cathodic protection. These permits are similar in nature to the State Waivers issued by OSFM in December 2024 and consented to by PHMSA in February 2025, but contain a significant modification relating to pre-operation repairs.
- *On January 23, 2026*, the State of California filed a petition with the United States Court of Appeals for the Ninth Circuit challenging three decisions of the Pipeline and Hazardous Materials Safety Administration (PHMSA) related to crude oil pipelines CA 234 & CA 325 in Santa Barbara, County. These decisions are: 1) a December 17, 2025, order issued claiming federal jurisdiction over lines CA 324 & CA 325; 2) a December 22, 2025, order approving a restart plan for lines CA 324 & CA 325; and 3) a December 23, 2025, order granting an "Emergency Special Permit" waiving federal compliance with pipeline safety regulations.

- 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 evaluated a request to perform maintenance anomaly digs and associated repair work along a four-mile section of pipeline on State Parks property.

- *On May 9, 2025*, the Department of Parks and Recreation issued a Right of Entry Permit to Sable to perform the 18 anomaly digs within Gaviota State Park, with work to commence on May 12, 2025.
- *As of June 6, 2025*, the work authorized by the Right of Entry Permit is complete, except for some of the restoration requirements, including restoring San Julian Road, which provides access to a local elementary school and some park visitor access. The section of road is not within the Coastal Zone.
- *On June 27, 2025*, staff sent Sable a letter detailing the steps for submitting a complete easement application.
- As of *August 12, 2025*, Sable has sent an easement request package. State Parks is reviewing and working with Sable to provide any other information needed for State Parks' review.
- *On November 13, 2025*, State Parks informed Sable it will be preparing an Initial Study to determine the proper CEQA documentation for Sable's easement request at Gaviota State Park.

- FOR MORE INFORMATION: Contact Department of Parks and Recreation Communications at newsroom@parks.ca.gov.

**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 FOR CENTRAL COAST REGIONAL WATER QUALITY CONTROL BOARD:
  - *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 was due March 10, 2025.
    - *On March 8, 2025,* Sable submitted an incomplete response to the Central Coast Regional Water Quality Control Board's January 22, 2025 directive to submit a technical report.
    - *On April 15, 2025*, Sable submitted additional incomplete information in response to the Central Coast Regional Water Quality Control Board's January 22, 2025 directive to submit a technical report.

- *On January 31, 2025,* Sable submitted an application for waste discharge requirements for its work at one waterway location.
    - *On March 20, 2025,* the Central Coast Regional Water Quality Control Board issued authorization to Sable to restore the one waterway location identified in its January 31, 2025 application.
- On *February 28, 2025*, the Central Coast Regional Water Quality Control Board inspected additional project work locations discovered as a result of public complaints. Staff observed unauthorized work within waters of the state and discharges of waste to waters of the United States.
- *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.
- *On March 13, 2025,* Sable submitted applications for waste discharge requirements for its work at four additional waterway locations.
    - On *June 2, 2025*, the Central Coast Regional Water Quality Control Board issued authorization to Sable to restore the four waterway locations identified in its March 13, 2025 applications.
- *On April 7, 2025*, Central Coast Regional Water Quality Control Board staff notified Sable and the public that the Board will consider adopting a resolution to refer alleged violations of the California Water Code for potential civil judicial enforcement to the California Office of the Attorney General at a public hearing on April 17, 2025.
- *On April 15, 2025*, the Central Coast Regional Water Quality Control Board issued a second notice of violation for unauthorized waste discharge into Santa Barbara County waterways and for failure to submit the technical report due on March 10, 2025.
- *On April 16, 2025,* the Central Coast Regional Water Quality Control Board issued a second directive to seek permit coverage.
- *On April 17, 2025*, at a public hearing, the Central Coast Regional Water Quality Control Board adopted a resolution referring alleged violations of the California Water Code for potential civil judicial enforcement to the California Office of the Attorney General.
- *On May 27, 2025,* Central Coast Regional Water Quality Control Board staff inspected recently conducted work sites in Gaviota State Park and adjacent to the Park.
- *On June 11, 2025,* Sable submitted a response disagreeing with assertions in the April 15, 2025 notice of violation.
- *On July 24, 2025,* Central Coast Regional Water Quality Control Board issued a third notice of violation for Sable's continued failure to submit the technical report due on March 10, 2025.
- On *August 19, 2025*, Sable submitted applications for waste discharge requirements for its work at nine additional waterway locations.
    - On *December 16, 2025*, the Central Coast Regional Water Quality Control Board issued authorizations to Sable to restore eight additional waterway locations identified in its August 19, 2025 applications.
- On *September 30, 2025*, Sable resubmitted an application for waste discharge requirements for its work at one waterway location, to align its application for the

location with the correct waste discharge requirements permitting mechanism. An application for this waterway location was previously submitted on August 19, 2025.
        - On *November 13, 2025*, the Central Coast Regional Water Quality Control Board issued authorization to Sable to restore the one waterway location identified in its September 30, 2025 application.
    - On *October 3, 2025,* the Central Coast Regional Water Quality Control Board filed a complaint against Sable in Santa Barbara Superior Court seeking civil penalties for Sable's alleged failure to comply with the Board's investigative order, failure to seek required permits after being so requested, and unlawful discharges of waste.
        - On *November 25, 2025*, Sable filed an answer to the complaint denying the key allegations in the complaint and asserting several affirmative defenses.
    - On *December 29, 2025*, Sable submitted a Notice of Project Complete for its work at one waterway location, requesting that the Central Coast Regional Water Quality Control Board find its restoration of the waterway location to be complete. The Central Coast Water Quality Control Board is reviewing the submittal.
- ACTIONS UNDERWAY FOR CENTRAL VALLEY REGIONAL WATER QUALITY CONTROL BOARD:
    - *On March 20, 2025*, Pacific Pipeline Company submitted an application to the Central Valley Regional Water Quality Control Board to obtain coverage under State Water Resources Control Board Order 2003-0003-DWQ, *Statewide General Waste Discharge Requirements for Discharges to Land with a Low Threat to Water Quality, for* a proposed discharge of approximately 6.1 million gallons of water used in hydrostatic testing of the Las Flores Pipeline System to a 20-acre agricultural area in Kern County.
    - *On April 9, 2025*, the Central Valley Regional Water Quality Control Board issued a notice to Pacific Pipeline Company, which authorized the proposed discharge pursuant to State Water Resources Control Board Order 2003-0003-DWQ.
    - *On June 6, 2025*, Pacific Pipeline Company sought authorization from the Central Valley Regional Water Quality Control Board to increase the discharge of water associated with hydrostatic testing authorized under State Water Resources Control Board Order 2003-0003-DWQ to 8.9 million gallon.
    - *On July 8, 2025*, the Central Valley Regional Water Quality Control Board authorized Pacific Pipeline Company's request to increase the discharge authorized under State Water Resources Control Board Order 2003-0003-DWQ.
- 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 (ExxonMobil) 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.
    - *On May 9, 2025*, Staff issued a letter to Exxon and Sable stating that the inspections required by the Commission's leases, for the portion of the offshore pipelines in state waters, and under the Commission's jurisdiction, have been completed and reviewed. This is not directly related to the repair work on the onshore pipeline.
- FOR MORE INFORMATION: Contact the State Lands Commission External Affairs at ExternalAffairsChief.Public@slc.ca.gov or (916) 574-1992.