

CHANGES PROPOSED BY ADVISORY TEAM

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
CENTRAL COAST REGION
[PROPOSED] RESOLUTION R3-2025-0024**

**AUTHORIZING REFERRAL FOR POTENTIAL JUDICIAL CIVIL ENFORCEMENT TO
THE CALIFORNIA ATTORNEY GENERAL**

WHEREAS:

1. Sable Offshore Corp. (Sable or Discharger) operates the onshore pipelines identified as CA-324 (formerly Line 901) and CA-325 (formerly Line 903). The pipelines are part of the Santa Ynez Unit oil and gas operation in Santa Barbara County, San Luis Obispo County, and Kern County.
2. In August 2024, Central Coast Regional Water Quality Control Board (Central Coast Water Board) staff were made aware by the public of pipeline remediation work along Line 324 and Line 325 along the Gaviota Coast in Santa Barbara County. Central Coast Water Board staff informed a Sable representative that intermittent and ephemeral streams are waters of the state and work within those waters requires permitting. The Sable representative confirmed Sable's knowledge of the regulatory requirements and confirmed Sable had surveyed all work locations and found no project impacts to waters of the state. On November 4, 2024, Central Coast Water Board staff inspected various project work locations. During this inspection, Central Coast Water Board staff observed and documented evidence demonstrating that Sable had performed work in and discharged waste to waters of the state. Sable did not file a report of waste discharge to obtain permitting, as required, before conducting the work.
3. On December 13, 2024, Central Coast Water Board staff issued a Notice of Violation (NOV) to Sable notifying it that any person discharging waste, or proposing to discharge waste, that could affect the quality of waters of the state is required to file a report of discharge prior to initiating the discharge; that Sable's activities observed at the November 4, 2024 inspection constituted a violation of the California Water Code (Water Code); and, that Sable's activities were likely also subject to stormwater permitting. The Central Coast Water Board also issued a directive to Sable pursuant to Water Code section 13260 ordering Sable to submit a report of waste discharge and providing additional notice to Sable of the requirements in Water Code sections 13260 and 13264.
4. On January 22, 2025, the Central Coast Water Board issued an investigative order pursuant to Water Code section 13267 requiring Sable to submit technical information, including an inventory of all of its land disturbance activities, and discharges to waters of the state and United States. While Sable responded in part to the order, it failed to provide Central Coast Water Board staff with critical required information such as a detailed assessment of

- waste discharges to surface waters resulting from its line remediation work activities, and identification of the locations and sizes of the areas of waters of the state and United States affected by its work.
5. While Sable has submitted after-the-fact permit applications to perform restoration work at some of the sites in which it had already performed unauthorized work in waters of the state and United States, it continued to perform work and discharge waste at new locations without filing required reports of waste discharge as required by Water Code sections 13260 and 13376 despite having received notices of the requirement.
 6. On February 28, 2025, Central Coast Water Board staff inspected project work locations it had not previously been aware of and had discovered as a result of public complaints. Central Coast Water Board staff observed that Sable had performed work at new locations in waters of the state. Staff also observed that Sable had discharged waste to Arroyo Quemado, a water of the United States. Sable did not file reports of waste discharge prior to performing the work at these locations as required by Water Code sections 13260 and/or 13376. Additionally, the Water Quality Control Plan for the Central Coastal Basin (Basin Plan), June 2019 Edition prohibits, pursuant to Water Code section 13243, the following 1) the discharge or threatened discharge of earthen and organic materials into any stream in the basin in quantities deleterious to beneficial uses and 2) unless otherwise authorized, waste discharges to all coastal surface streams and natural drainageways that flow directly to the ocean within the South Coast Hydrologic Units¹ except where discharge is associated with an approved wastewater reclamation program.
 7. Sable's practice of performing unauthorized work in waters of the state and United States has inhibited the Central Coast Water Board from ensuring that appropriate mitigation and best management practices are in place to protect water quality. Furthermore, Sable's refusal to provide the Central Coast Water Board with specified information regarding its work locations and work scope, has inhibited the Board's ability to assess impacts to beneficial uses of affected waters.
 8. The Central Coast Water Board may request that the Office of the Attorney General of the State of California (Attorney General) file a petition in Superior Court to impose liability pursuant to California Water Code sections 13261, 13265, 13268, 13350, and 13385; and may request that the Attorney General seek a temporary restraining order or injunction requiring compliance with Section 13260, pursuant to California Water Code section 13262.
 9. Given repeated failure to comply with regulatory requirements, referral to the Attorney General will allow the Central Coast Water Board to consider pursuing more appropriate civil liability and injunctive relief than would

¹ Sable's pipeline remediation work along Line 324 and Line 325 along the Gaviota Coast in Santa Barbara County is within the South Coast Hydrologic Units defined in the Basin Plan.

otherwise be allowed if the Central Coast Water Board pursued an administrative liability action.

10. After providing, pursuant to Water Code section 13350, subdivision (g), requisite notice to the public and to Sable and holding a public hearing on April 17, 2025, the Central Coast Water Board finds it necessary and appropriate to refer this matter to the Attorney General for enforcement, to potentially seek injunctive relief, bring other applicable causes of action, and/or judicially imposed civil liabilities under applicable sections of the Water Code.

THEREFORE BE IT RESOLVED THAT:

The Central Coast Water Board:

Hereby requests that the California Attorney General petition the Superior Court for an assessment of civil liability, for appropriate injunctive and declaratory relief, if any, and for any other form of relief the Superior Court deems necessary and proper against Sable for violations of and in accordance with California Water Code sections 13260, 13261, 13262, 13264, 13265, 13267, 13268, 13350, 13361, 13376, and 13385, and any other applicable statutes, as may be appropriate.

~~Any person affected by this action may petition the State Water Resources Control Board (State Water Board) to review the action in accordance with section 13320 of the California Water Code and Title 23, California Code of Regulations, Section 2050. The State Water Board must receive the petition within 30 days of the date of this Resolution. Copies of the law and regulations applicable to filing petitions will be provided upon request.~~

CERTIFICATION

I, Ryan E. Lodge, Executive Officer, hereby certify that the foregoing is a full, true, and correct copy of the Resolution adopted by the California Regional Water Quality Control Board, Central Coast Region, at its regular meeting on April 17-18, 2025.

Ryan E. Lodge
Executive Officer