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California Regional Water Quality Control Board,
Central Coast Region*

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SANTA BARBARA

**PEOPLE OF THE STATE OF
CALIFORNIA EX REL. CALIFORNIA
REGIONAL WATER QUALITY
CONTROL BOARD, CENTRAL COAST
REGION,**

Plaintiff,

v.

**SABLE OFFSHORE CORP., a Delaware
Corporation; and DOES 1 through 10,
inclusive,**

Defendants.

Case No. 25CV06285

**COMPLAINT FOR CIVIL LIABILITIES
AND INJUNCTIVE RELIEF**

**(1) FAILURE TO COMPLY WITH
INVESTIGATIVE ORDER
(Wat. Code, §§ 13267, 13268);**

**(2) FAILURE TO REPORT WASTE
DISCHARGES
(Wat. Code, §§ 13260, 13261); and**

**(3) DISCHARGE OF WASTE WITHOUT
PERMIT REQUIREMENTS
(Wat. Code, §§ 13264, 13265).**

INTRODUCTION

1. This complaint addresses numerous instances wherein defendant Sable Offshore Corp. (Defendant or Sable) excavated and discharged material that could affect water quality in the rich aquatic and riparian habitat of Santa Barbara and San Luis Obispo Counties without notice to the California Regional Water Quality Control Board, Central Coast Region (Regional Water Board). Rushing to meet a July 1, 2025 deadline imposed by the California Office of State Fire Marshal for restarting its onshore crude oil pipeline network, Sable intentionally ignored its

1 obligations under California Water Code (Water Code) sections 13260, et seq. to apply to the
2 Regional Water Board for permits *before* it proposes to discharge waste that could affect the
3 water quality of the state. By avoiding the imposition of waste discharge requirements and
4 associated regulatory oversight of its activities until after the work was completed, Sable placed
5 profits over environmental protection in its rush to get oil on the market.

6 2. Sable reports that there are 646 million barrels of oil as the “remaining total net
7 estimated resources” in offshore oil deposits known as the Santa Ynez Unit. Between this cache
8 of petroleum that lies beneath three oil platforms off the coast of Santa Barbara and the oil
9 refineries in Bakersfield, Los Angeles and the Bay Area are several segments of underground
10 insulated pipeline running along the coast and through stretches of sensitive aquatic and riparian
11 habitat. Sable recently acquired these pipelines from ExxonMobil and commencing operation is
12 mission critical for the success of its planned development of the Santa Ynez Unit.

13 3. The configuration of Sable’s onshore pipeline network, now operated as Lines 324
14 and 325, poses unique operational integrity management challenges. The former operator of these
15 pipelines failed to meet these challenges and on May 19, 2015 the segment that is now Line 324
16 failed, releasing at least 3,000 barrels of crude oil into Refugio Beach State Park and then into the
17 Pacific Ocean. Thereafter, operation of Line 324 and the section of Line 325 which runs through
18 Santa Barbara County were shut down, and the remaining section of Line 325 was ordered to
19 operate at a lower pressure. After years of litigation, a Consent Decree was entered in United
20 States District Court, Central District of California Case No. 2-20-CV-02415 (Consent Decree)
21 imposing stringent obligations for re-starting operation of Line 324 and Line 325 from the
22 Gaviota pumping station at the coast to the Sisquoc station about 40 miles inland.

23 4. To meet the conditions imposed by the Consent Decree, Sable needed to retrofit the
24 lines by installing safety check valves and make 144 anomaly repairs over what is a relatively
25 short span of pipeline. The latter activity, colloquially referred to as a “pig and dig” operation,
26 requires excavation to expose sections of pipe identified for repair by “smart pigs” run through
27 the pipeline to identify metal loss. Both the valve installation and the repair excavations would
28 typically require road and vegetation clearance for access. A number of these repair sites were at

1 or within streambeds and channels that are designated as “Waters of the State” (WOTS) and, in
2 some cases, are also “Waters of the United States” (WOTUS). Accordingly, Sable is required to
3 identify and permit excavation activity that “could affect the quality of waters of the state” *before*
4 commencing work. When Sable’s integrity and environmental management teams developed
5 what should have been a comprehensive “Repair Plan” for Lines 324 and 325 (Repair Plan) as
6 required by pipeline regulations, they knew waste discharge requirements were necessary for
7 excavation activity that could affect water quality but chose to ignore Sable’s obligation to obtain
8 them at the fourteen sites identified below.

9 5. With this action, Plaintiff People of the State of California, for and on behalf of the
10 California Regional Water Quality Control Board, Central Coast Region (Plaintiff or Regional
11 Water Board), seeks to impose civil liability on Sable as the operators and owners of Lines 324
12 and 325 for numerous violations of its obligation to notify the Regional Water Board of proposed
13 waste discharges and obtain the appropriate regulatory requirements, thereby preventing the
14 Regional Water Board from assuring best management practices are employed to avoid, minimize
15 and mitigate impacts to water quality.

16 **PARTIES**

17 6. Plaintiff REGIONAL WATER BOARD is a state agency created by the Legislature
18 and granted duties and authorities in the Porter-Cologne Water Quality Control Act. (Wat. Code,
19 § 13000 et seq.) With this Act the Legislature directed the State Water Resources Control Board
20 (State Water Board) to formulate statewide water quality policy and established nine regional
21 water quality control boards to establish and enforce statutes and regulations, water quality
22 control plans and policies, and waste discharge permits to ensure the protection of beneficial uses
23 of waters of the state within nine designated regions in California. The Regional Water Board
24 encompasses most of Santa Barbara County and San Luis Obispo County, where the subject
25 sections of Sable Lines 324 and 325 are located.

26 7. Defendant SABLE OFFSHORE CORPORATION was and is a Delaware corporation
27 designating its principal place of business as Houston, Texas. Sable is a person as that term is
28 defined in Water Code section 19. Sable’s sole business activity is to own and operate offshore oil

1 production and associated processing and transportation facilities within California. Accordingly,
2 its operation of Lines 324 and 325 are under the jurisdiction of the California State Fire Marshal
3 as opposed to federal agencies within the Department of Interior.

4 8. With regard to defendants Does 1 through 10, inclusive, the true names and capacities
5 of which, whether corporate, individual or otherwise, are currently unknown to Plaintiff, who
6 therefore sues each of these defendants by such fictitious names. Plaintiff is informed and
7 believes that each of defendants Does 1 through 10 is responsible in some manner for the events,
8 occurrences, and circumstances that form the basis of this lawsuit, and is thereby liable for the
9 relief sought herein, and Plaintiff will request the Court's leave to amend this Complaint to show
10 the true names and capacities of said defendants when the same have been ascertained.

11 VENUE

12 9. Venue is appropriate in Santa Barbara County because the events giving rise to the
13 causes of action alleged herein occurred in Santa Barbara County.

14 STATUTORY BACKGROUND

15 10. The Porter-Cologne Water Quality Control Act, Water Code section 13000 et seq., is
16 a pillar of California's exemplary environmental protection regulatory framework. The
17 Legislature demands that "the quality of all the waters of the state shall be protected for use and
18 enjoyment by the people of the state" and that "the quality of the waters of the state shall be
19 regulated to attain the highest water quality which is reasonable." (Wat. Code, § 13000.)

20 11. An important tool in achieving the objectives of the Porter-Cologne Water Quality
21 Control Act is Water Code section 13260 which provides in relevant part: "Each of the following
22 persons shall file with the appropriate regional board a report of the discharge, containing the
23 information that may be required by the regional board: (1) A person discharging waste, or
24 proposing to discharge waste, within any region *that could affect the quality of the waters of the*
25 *state*, other than into a community sewer system." (Wat. Code, § 13260, subd. (a), italics added.)
26 Failure to furnish the required report of waste discharge when so requested by a regional board
27 subjects the violator to a civil liability of up to \$5,000 for each day the violation occurs. (Wat.
28 Code, § 13261, subds. (a) and (b)(2).)

1 12. Water Code section 13264 provides that “no person shall initiate a new discharge of
2 waste ... prior to the filing of the report required by Section 13260.” (Wat. Code, § 13264, subd.
3 (a).) Persons who are violating or threaten to violate this requirement may be enjoined from doing
4 so by the superior court. (*Id.*, subd. (b).) Additionally, any person discharging waste in violation
5 of Section 13264, after such violation has been called to their attention in writing by the regional
6 board is civilly liable for up to \$5,000 for each day in which the violation occurs. (Wat. Code,
7 § 13265, subd (a) and (b)(2).)

8 13. Sable’s earthen excavations done as part of its Repair Plan for Lines 324 and 325,
9 which can impact water quality by flow and temperature variations, increased turbidity, siltation,
10 and increased nutrients, may be authorized through enrollment in two general Water Quality
11 Orders issued by State Water Board, one for WOTS and another relating to waters in the state that
12 are subject to federal oversight, commonly referred to as WOTUS. General orders are issued for
13 specific categories of discharges that share common characteristics or criteria, allowing
14 dischargers within these categories to enroll in them. Alternatively, depending upon the
15 cumulative size or characteristics of the discharges, and at the discretion of Regional Water Board
16 staff, Sable may need to pursue an individual waste discharge permit.

17 14. The general Water Quality Order applicable to WOTS impacted by Sable’s Repair
18 Plan for Lines 324 and 325 that is not subject to regulation under the federal Clean Water Act is
19 Statewide General Waste Discharge Requirements for Dredge or Fill Discharges to Waters
20 Deemed by the U.S. Army Corps of Engineers to be Outside Federal Jurisdiction (WQO 2004-
21 0004).

22 15. The general Water Quality Order applicable to WOTS impacted by Sable’s Repair
23 Plan for Lines 324 and 325 which is also WOTUS and therefore subject to regulation under the
24 federal Clean Water Act is State Water Board Order No. 2020-0039-EXEC for the 2021 U.S.
25 Army Corps’ Nationwide Permits (Order 2020-0039-EXEC). The Nationwide Permit applicable
26 here is NWP-12 for oil or natural gas pipeline activities. Water Code section 13376 provides that
27 “any person who discharges pollutants or proposes to discharge pollutants to the navigable waters
28 of the United States within the jurisdiction of this state or a person who discharges dredged or fill

1 material or proposes to discharge dredged or fill material into the navigable waters of the United
2 States within the jurisdiction of this state shall file a report of the discharge in compliance with
3 the procedures set forth in [Water Code] Section 13260.”

4 16. Both WQO 2004-0004 and Order 2020-0039-EXEC provide a comprehensive system
5 for a person proposing to discharge waste that could affect water quality to comply with Section
6 13260 when planning excavation activities such as those carried out by Sable during its Repair
7 Plan for Lines 324 and 325. The process begins with submission to the Regional Water Board of
8 a Notice of Intent to discharge waste which identifies the specific location of the affected WOTS
9 or WOTUS, provides a meaningful description of the work involved, and sets out a plan to
10 mitigate effects to water quality using best management practices. This provides Regional Water
11 Board with the opportunity to assess the impact of the planned excavation and provide input
12 regarding the mitigation and restoration techniques to be employed. Also, once the project is
13 enrolled into the regulatory program the Regional Water Board may review the progress and
14 success of site restoration to assure no permanent impact to water quality.

15 17. Water Code section 13267 provides the Regional Water Board with authority to
16 “investigate the quality of any waters of the state within its region.” (Wat. Code, § 13267, subd.
17 (a).) In conducting such investigation, the Regional Water Board may “require that any person ...
18 who proposes to discharge waste within its region ... shall furnish, under penalty of perjury,
19 technical or monitoring program reports which the regional board requires.” (*Id.*, subd. (b).)
20 Failure to furnish technical reports required by section 13267 subjects the violator to civil
21 penalties for up to \$5,000 for each day the violation occurs. (Wat. Code, § 13268, subds. (a)(1)
22 and (b)(2).)

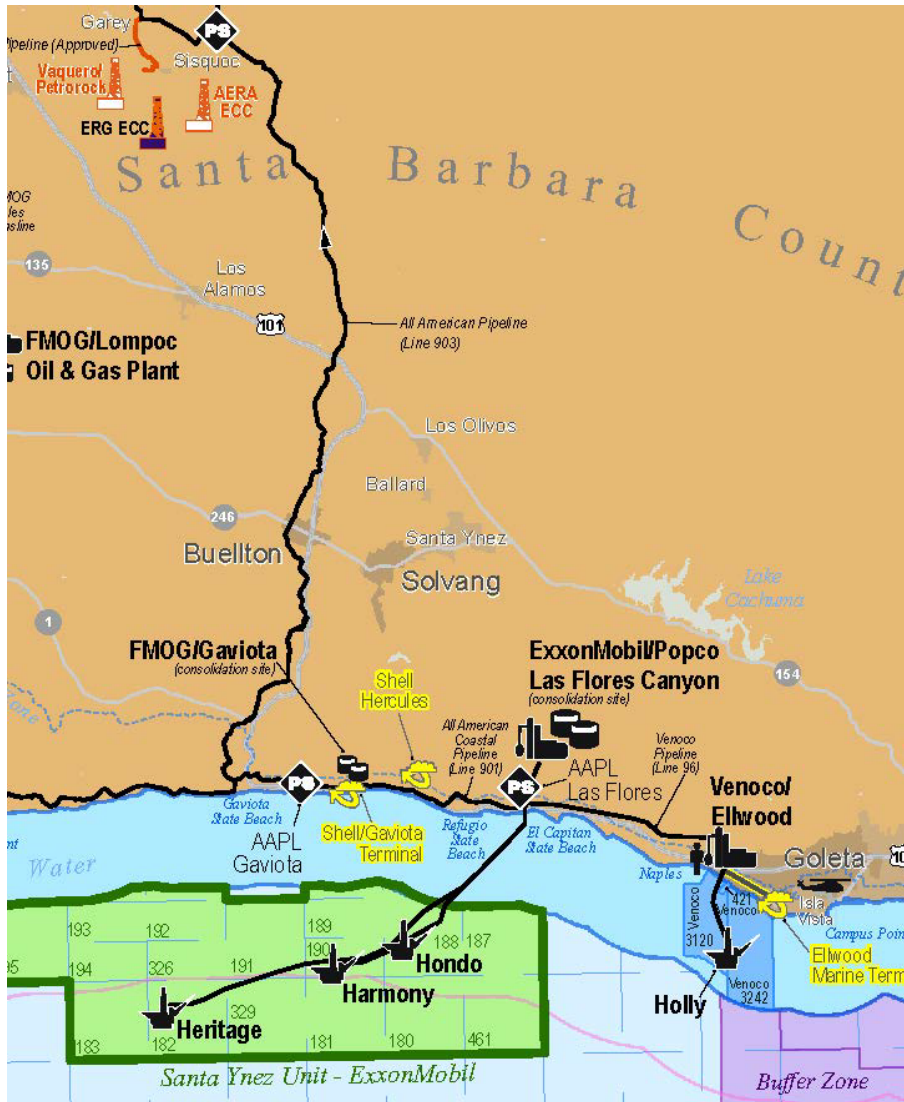
23 **GENERAL ALLEGATIONS**

24 18. The events and facts alleged herein are stated on information and belief, unless
25 explicitly stated otherwise.

26 **A. Sable’s Repair Plan for Lines 324 and 325**

27 19. Sable touts the Santa Ynez Unit to investors as a highly profitable integrated oil
28 exploration, production and transportation unit involving 112 offshore oil wells, an associated

1 offshore pipeline network, the Las Flores Canyon Processing Plant, and an onshore underground
2 pipeline network that spans 10.6 miles along the Gaviota Coast, and then another 113 miles over
3 the Tehachapi range to Bakersfield. The graphic below depicts that portion of the Santa Ynez
4 Unit within Santa Barbara County:



1 The short section of pipeline running east to west from the Las Flores Plant to the Gaviota
2 pumping station (PS on the above graphic) is Line 324, the section that failed in 2015 causing the
3 Refugio Beach oil spill. The section running south to north from the Gaviota pumping station to
4 the Sisquoc station is the section of Line 325 that, along with Line 324, is subject to the Consent
5 Decree.

6 20. Under applicable federal pipeline regulations, Sable Line 324 and the Gaviota-
7 Sisquoc segment of Line 325 run through “high consequence areas” (HCA) for purposes of
8 pipeline integrity management for obvious reasons. (49 CFR § 194.452 (2025) [hazardous
9 materials regulations].) Line 324 is immediately adjacent to the coast and Line 325 runs through
10 Gaviota State Park. This HCA designation imposes high-level integrity management obligations
11 to protect, among other things, environmental quality along the pipeline routes. Accordingly,
12 Sable knew or should have known that their extensive Repair Plan for these lines involves
13 excavation work and associated waste discharges that could affect water quality in this sensitive
14 aquatic and riparian habitat well before it was so advised by Regional Water Board staff in early
15 August of 2024.

16 21. Sable’s “pig and dig” operation on Line 324 and the Gaviota-Sisquoc segment of
17 Line 325 is a regular pipeline maintenance procedure typically done every 3 to 5 years to check
18 for corrosion and damage. It begins with device known as a “smart pig” that is run through the
19 length of the pipe that provides data regarding the extent of corrosion using electromagnetic or
20 ultrasound imagery. Corrosion thins the walls of the pipeline and, if not timely repaired, can
21 cause the line to rupture as occurred on Line 324 in 2015. Once this “pigging” is complete,
22 operators typically prepare a Repair Plan to address corrosion and damage in need of repair in the
23 field. This involves a number of separate “digs” to expose damaged sections of pipeline for repair
24 and reinforcement. A typical Sable dig looks like this:



22. The “digging” aspect of Sable’s integrity management operation began in October 2024 and wrapped up some time in mid-May 2025. Sable reportedly conducted 144 repairs involving dozens of dig sites. Fourteen of these excavations involved activity where Sable was required to obtain waste discharge permits from the Regional Water Board, yet not one was sought until well after the work was completed.

23. Excavation work such as that depicted in the image included in Paragraph 21 above requires heavy equipment. Movement of that equipment involves vegetation clearance and road

1 work that could also affect water quality such that a discharge permit is required. Vegetation
2 removal, such as that depicted in the streambed below, can create harmful silting within streams
3 and creeks when it rains and the streambed fills with water. Also, loss of vegetation cover can
4 elevate water temperature impacting fish and wildlife development when streams are flowing.



21 **B. Regional Water Board’s Initial Efforts to Obtain Regulatory Compliance**

22 24. In August 2024, Regional Water Board staff learned that Sable would be conducting
23 pipeline excavation and repair work on Line 324 and the Gaviota-Sisquoc segment of Line 325.
24 Staff contacted Sable management to inform them that the project could affect the water quality
25 of streams along the pipeline route and determine what the company would do to assure such
26 impacts would be addressed. Sable Vice-President Steve Rusch informed Regional Water Board
27 staff on August 8, 2024 that “Sable conducts environmental surveys for all work locations as part
28

1 of its site evaluation and understands the regulatory requirements and processes for water
2 qualification certificates involving both U.S. and state waters.”

3 25. In early October 2024, Regional Water Board staff received a citizen complaint
4 addressing multiple land disturbances by Sable and its contractors across what was identified as
5 WOTS along the Gaviota Coast. Thereafter, Regional Water Board staff followed up several
6 times with Sable employees to request access to these sites to conduct an inspection following up
7 on the concerns expressed to Mr. Rusch in August.

8 26. On November 4, 2024, Sable finally allowed Regional Water Board staff access to
9 investigate Sable’s pipeline excavation and maintenance activities on a small section of Line 324.
10 During this investigation, Regional Water Board staff observed an excavation site within and
11 adjacent to state waters that would have required a permit under the statutory and regulatory
12 scheme before proceeding with such activity. At that time staff once again advised Sable
13 personnel of their statutory obligation to obtain waste discharge permits before conducting
14 excavation activities that could affect water quality.

15 27. Having received no response to their efforts to persuade Sable to meet its statutory
16 and regulatory requirements for execution of its Repair Plan, on December 13, 2024 the Regional
17 Water Board issued its Directive to Obtain Regulatory Coverage attached hereto as Exhibit A
18 (2024 Directive). While the 2024 Directive identified a specific site in need of regulatory
19 compliance, it also provided Sable management with a clear request to commence regulatory
20 compliance for all of its Repair Plan operations going forward. The 2024 Directive further
21 provided Sable with all the information needed to meet its regulatory requirements and allow the
22 Regional Water Board team the opportunity to assure Sable is using best management practices
23 for protection of the environment. Sable did not seek administrative review of the 2024 Directive
24 by filing a petition to the State Water Board.

25 28. Also on December 13, 2024, Regional Water Board issued its Notice of Violation for
26 Unauthorized Discharge of Waste to Waters of the State regarding an ephemeral stream impacted
27 by an excavation project near Baron Ranch Trailhead in Santa Barbara County at lat. 34.46834,
28 long. 120.10623 (Baron Ranch Trailhead Site) which is attached hereto as Exhibit B (2024 Notice

of Violation). This comprehensive Notice of Violation provided Sable with an assessment of all streambed and waste discharge activity that could affect water quality of which Regional Water Board staff was aware at the time. In the 2024 Notice of Violation, the Regional Water Board sets out a thorough description of the streambed features that demonstrate regular surface water flow, the scour and detritus observed within the streambed, and the available references delineating the streambed as “Riverine Wetlands.” The Regional Water Board further provided a complete description of Sable activity that could affect water quality at and downstream from the identified waterway, including: (a) the construction of an access road across the bed and bank of the stream; (b) pit excavation across the bed and bank to obtain access to the underground pipe; (c) mounded cut and fill adjacent to the banks; and (d) vegetation clearance.

C. The Regional Water Board’s Efforts to Obtain a Technical Report

29. After the Regional Water Board issued the 2024 Directive and the 2024 Notice of Violation to Sable on December 13, 2024, Regional Water Board staff continued to follow up with Sable management in an effort to obtain the company’s compliance. Heading into late January 2025 no response from Sable to either the 2024 Directive or the 2024 Notice of Violation was received or appeared to be forthcoming. Moreover, based on the November 4, 2024 site investigation and continuing citizen complaints it was evident Sable’s August 2024 representation that it would conduct environmental assessments as part of the Repair Plan and comply with waste discharge requirements where needed was patently false. The Regional Water Board had identified at least one site where repair activities resulted in waste discharge to WOTS that affected water quality and was receiving credible evidence of ongoing violations at other locations.

30. Water Code section 13267 authorizes the Regional Water Board to investigate the quality of waters and, in so doing, requires a person such as Sable who is discharging waste, or proposing to discharge waste, to provide a technical report detailing how that activity impacts the quality of any waters within the state. Because Sable was not identifying and reporting waste discharges that could affect water quality as required under Section 13260, the Regional Water Board applied this important regulatory tool to get Sable to perform the analysis it should have

1 done before commencing work in August of 2024, at which time it blithely represented its work
2 would have no impact on water quality.

3 31. On January 22, 2025, pursuant to its authority under Water Code section 13267, the
4 Regional Water Board issued its Requirement to Submit a Technical Report Associated with
5 Discharge of Earthen Material to Waters of the State, attached hereto as Exhibit C (Section 13267
6 Order). In large part, this Section 13267 Order formalized the inquiry put to Sable by the
7 Regional Water Board in August 2024 by requiring “a detailed assessment” of Sable’s excavation
8 work and how it could affect the quality of WOTS or WOTUS, and a further “detailed assessment
9 of waste discharge to surface waters resulting from Sable’s . . . work activities.”

10 32. By its own admission, Sable claims to well understand its fundamental obligations
11 when excavating and discharging earthen waste materials within and adjacent to creeks and
12 streambeds flowing through riparian habitat. With the 2024 Directive, 2024 Notice of Violation,
13 and the Section 13267 Order in hand by January 2025, Sable was also provided with Regional
14 Water Board guidance regarding: (a) the scope of its regulatory requirement; (b) references of
15 what to look for when discerning within that regulatory scheme whether WOTS and/or WOTUS
16 is implicated by the work they are doing; (c) a description of the types of activity that could affect
17 water quality within those waterways; and (d) input from the November 4, 2024 site visit and an
18 offer to provide continued assistance working through the obligations imposed by Section 13260.

19 33. Knowing full well what the Regional Water Board team was seeking and having been
20 provided with substantial guidance in that regard, Sable nevertheless provided piecemeal and
21 belated responses to the Section 13267 Order on March 7 and April 15, 2025. These responses
22 provided incomplete information with little meaningful detail regarding the extensive excavation,
23 repair and backfilling conducted as part of the Repair Plan. The inadequacy of Sable’s initial
24 response to the Section 13267 Order made clear it did not perform meaningful assessment of the
25 environmental impact of its excavation campaign through Santa Barbara’s rich and unique
26 landscape before despoiling it.

27 34. In simple terms, the Section 13267 Order required Sable to provide critical
28 information regarding the presence of streams, channels, drainages and wetlands at or adjacent to

1 planned or completed repair excavations. One would expect a responsible oil production company
2 running 125 miles of underground pipeline with unique integrity challenges through the high
3 consequence areas of Santa Barbara and San Luis Obispo Counties would have that information
4 readily available in a database for use by its integrity and environmental management teams. Not
5 so. All Sable could come up with in response was a one sentence reference to a Biological
6 Resource Assessment prepared in 2020 by the former pipeline operator as part of its eventually
7 abandoned plan to replace Line 324 and Gaviota-Sisquoc segment of Line 325. Not developed or
8 tailored to Sable's plan for restarting the lines, the subject assessment provides little meaningful
9 information regarding the potential impact of Sable's 144 anomaly Repair Plan on water quality
10 of the numerous streams, channels and drainage within the planned excavations.

11 35. Sable's failure to specify its intended waste discharge locations and obtain essential
12 permits prior to commencing work led to the Regional Water Board mandating under the Section
13 13267 Order that Sable conduct an investigation and submit a thorough assessment of proposed
14 waste discharges that could affect water quality. Instead, Sable provided a bare outline of the
15 steps taken to expose and repair the underground pipeline which was useless to the Regional
16 Water Board in assessing the impact of the discharge. It should not have been difficult for Sable
17 to respond more completely to Regional Water Board's requirement to set out the scope of the
18 discharge as everything sought should be in the Repair Plan and associated reports Sable is
19 required to maintain regarding each dig and repair and is well within Sable's environmental
20 management expertise and experience.

21 36. Sable's belated response to the Section 13267 Order submitted on April 15, 2025 was
22 not only limited by its failure to adequately identify WOTS and WOTUS, Sable provided little
23 meaningful information regarding the four sites identified as potentially impacting water quality.
24 Sable simply stated that the sites were excavated, shored, backfilled and compacted with no detail
25 regarding the volume removed, where it was placed, or the impact on the riparian and aquatic
26 habitats involved, which were all required elements of the technical report required under the
27 Section 13267 Order.
28

1 37. Sable also chose to unreasonably limit the temporal scope of its response to the
2 Section 13267 Order. At the time of its inadequate submissions in March and April of 2025,
3 Sable management knew full well additional excavation and repair work would be ongoing.
4 However, instead of identifying sites where Sable was planning to carry out activities resulting in
5 earthen waste discharges that could affect water quality as required by the Section 13267 Order,
6 Sable chose to limit its response to work done as of the March 10, 2025 due date of the Technical
7 Report (which ironically was not met). This cynical approach to the Regional Water Board's
8 regulatory permitting requirements was obviously taken to avoid any potential delay in getting the
9 sites permitted and any associated Regional Water Board review that might impact the July 1,
10 2025 deadline for Sable's completion of repairs imposed by the Fire Marshal.

11 **D. The Regional Water Board's Continuing Efforts to Obtain Compliance**

12 38. The Regional Water Board's months-long effort to obtain compliance from Sable
13 notwithstanding, Sable continued work at the Baron Ranch Trailhead Site without a permit and
14 staff continued to receive complaints from area residents regarding Sable's impact to state water
15 quality. Accordingly, the Regional Water Board conducted a second on-site investigation of
16 Sable's Repair Plan activities on February 28, 2025. Staff once again observed excavation,
17 roadwork, and vegetation clearance within and adjacent to streams and channels that could affect
18 water quality. Sable was advised to permit these operations and assure that further work was
19 assessed and reviewed before excavation operations commence. As set forth in greater detail
20 below, throughout the entire 10-month execution of its Repair Plan for Lines 324 and 325 Sable
21 did not identify and permit a single excavation site before putting shovel to dirt.

22 39. Because the Regional Water Board did not receive any permit applications for the
23 waste discharge sites identified during the February 2025 inspection, it issued a Notice of
24 Violation for Unauthorized Discharges of Waste to Waters of the State and United States which is
25 attached hereto as Exhibit D (April 2025 Notice of Violation) on April 15, 2025. As with the
26 2024 Notice of Violation, the Regional Water Board specifically identified each of the five sites
27 and the activity conducted that could affect water quality. In the April 2025 Notice of Violation
28

1 the Regional Water Board also specified which items were missing from Sable's response to the
2 Section 13267 Order.

3 40. On April 16, 2025, the Regional Water Board followed up on its April 2025 Notice of
4 Violation by issuing its Directive to Submit a Report of Waste Discharge for Unauthorized
5 Discharges of Waste and Future Discharges of Waste, Santa Barbara, San Luis Obispo, and Kern
6 Counties attached hereto as Exhibit E (the 2025 Directive). This 2025 Directive not only covered
7 the sites identified in the April 2025 Notice of Violation, but further directed Sable to "submit a
8 report of waste discharge for regulatory coverage for all discharges of waste that could affect the
9 quality of waters of the state associated with its work related to Sable's pipeline remediation and
10 planned restart of Lines 324 and 325. This applies to discharges that have already occurred *as*
11 *well as potential future discharges.*" (Emphasis added.) It bears repeating that Sable continued to
12 ignore its obligation to permit ongoing discharges of waste before commencing work; as alleged
13 in more detail below, the Regional Water Board has identified sites excavated after the 2025
14 Directive which required a report of waste discharge before commencing work. Sable did not
15 seek administrative review of the 2025 Directive by filing a petition for review with the State
16 Water Board.

17 **E. Sable's Continuing Failure to Permit Discharge Sites Affecting Water Quality**

18 41. On January 31, 2025, Sable finally took a very modest step towards regulatory
19 compliance by submitting its Notice of Intent to discharge waste at the Baron Ranch Trailhead
20 Site under WQO 2004-0004. At the time of this submission, Sable had already performed work
21 and was still continuing to unlawfully discharge waste at the site in the manner detailed in the
22 December 13, 2024 Notice of Violation. On March 20, 2025 the Regional Water Board issued its
23 Notice of Assignment for that site approving Sable's proposed mitigation plan. It is important to
24 note that Sable's belated submission is not a golden ticket to continue discharging waste during
25 the permitting process; only after the Regional Water Board enrolls the site under the general
26 permit may Sable lawfully proceed with its excavation and associated discharge. This did not
27 occur at any of the fourteen sites identified in this Complaint until after the excavation causing
28 the discharge that could affect water quality was completed.

1 42. On March 13, 2025, having received the 2024 Directive and Section 13267 Order
2 focusing attention on the permitting and waste discharge concerns, Sable belatedly submitted
3 Notices of Intent to discharge waste at the four sites identified below:

- 4 a. A repair excavation at the Carrizo Tributary to the Cayama River, lat.
5 35.05946, long. 119.93314 (Cayama River Tributary Site) pursuant to the
6 general permit established under WQO 2004-0004.
- 7 b. A repair excavation on the Buellton Ranch at a tributary to Peterson Creek,
8 lat. 34.62761, long. 120.20012 (Peterson Creek Tributary Site) pursuant to
9 the general permit established under WQO 2004-0004.
- 10 c. A repair excavation at a tributary to Nojoqui Creek, lat. 34.57379, long.
11 120.19591 (Nojoqui Creek Tributary Site) pursuant to the general permit
12 established under Order 2020-0039-EXEC.
- 13 d. A repair excavation at a tributary to Asphaltum Creek, also known as Foxen
14 Canyon, at lat. 35.05946, long. 119.93314 (Foxen Canyon Tributary Site)
15 pursuant to the general permit established under Order 2020-0039-EXEC.

16 Notices of Applicability enrolling Sable's projects in the identified general permits were provided
17 to Sable by the Regional Water Board at each of these four sites on June 2, 2025.

18 43. As Sable's belated Notices of Intent did not cover all the sites identified in the 2024
19 and April 2025 Directives, and Regional Water Board staff suspected Sable had made additional
20 excavations that could affect water quality, staff conducted a third site investigation on May 27,
21 2025. At this time, the Regional Water Board learned that the Repair Plan for Lines 324 and 325
22 was complete and understood Sable's position to be that only the five sites for which Notices of
23 Intent had been submitted were subject to the requirements of Section 13260. During the May 27,
24 2025 inspection, Regional Water Board identified additional excavation sites that had disturbed
25 WOTS and therefore should have been permitted prior to commencing work.

26 44. On August 19, 2025, four months after the Regional Water Board issued its April 16,
27 2025 Directive specifically ordering it to do so, Sable submitted Notices of Intent to discharge
28 waste at the following five sites:

- a. A repair excavation at Venadito Canyon Creek, a tributary to the Pacific Ocean, lat. 34.46490, long. 120.05230 (Venadito Canyon Site) pursuant to the general permit established under WQO 2004-0004.
- b. A repair excavation in the Arroyo Quemado, a tributary to the Pacific Ocean, lat. 34.47340, long. 111910 (Arroyo Quemado Site) pursuant to the general permit established under WQO 2004-0004.
- c. A repair excavation at the Cañada del Leon (Sable Site F10), a tributary to the Pacific Ocean, lat. 34.47580, long. 120.19640 (Cañada del Leon Site) pursuant to the general permit established under WQO 2004-0004.
- d. A repair excavation in the Cañada de las Zorillas East Branch (Sable Site F7), a tributary to the Pacific Ocean, lat. 34.47340, long. 120.17620 (Zorillas Drainage F7 Site) pursuant to the general permit established under WQO 2004-0004
- e. A repair excavation in the Cañada de las Zorillas East Branch (Sable Site F8), a tributary to the Pacific Ocean, lat. 34.47340, long. 120.17620 (Zorillas Drainage F8 Site) pursuant to the general permit established under WQO 2004-0004.

45. Also on August 19, 2025, Sable identified four additional repair sites which, after finally doing the biological assessment it should have done before implementing the Repair Plan, were determined to be excavations that could affect water quality. Several of these sites were identified during the Regional Water Board site investigation on May 27, 2025. They are:

- a. A repair excavation in Tajiguas Beach Creek at Grey Fox Ranch (Sable Dig No. 0324-2022-0023097.83), lat. 34.46220, long. 120.09200 (Grey Fox Ranch Site) pursuant to the general permit established under WQO 2004-0004.
- b. A repair excavation in the Cañada de la Gallina at a tributary to the Pacific Ocean, lat. 34.47490, long. 120.14560 (Cañada de la Gallina Site) pursuant to the general permit established under Order 2020-0039-EXEC.

- 1 c. An access route in Gaviota State Park cut through a tributary to the Cañada
2 de la Gaviota, lat. 34.47930, long. 120.22850 (Cañada de la Gaviota Site)
3 pursuant to the general permit established under WQO 2004-0004.
- 4 d. A repair excavation in the Arroyo Hondo, a tributary to the Pacific Ocean,
5 lat. 34.47550, long. 120.14170 (Arroyo Hondo Site) pursuant to the general
6 permit established under WQO 2004-0004.

7 46. Because Sable deliberately avoided its obligation to obtain waste discharge
8 requirements before commencing work at each of the sites identified above and took no action
9 until directed by the Regional Water Board, the Baron Ranch Trailhead Site, Cayuma River
10 Tributary Site, Peterson Creek Tributary Site, Nojoqui Creek Tributary Site, Foxen Canyon
11 Tributary Site, Venadito Canyon Site, Arroyo Quemado Site, Cañada de Leon Site, Zorillas
12 Drainage F7 Site, Zorillas Drainage F8 Site, Grey Fox Ranch Site, Cañada de la Gallina Site,
13 Cañada de la Gaviota Site, and Arroyo Hondo Site shall be collectively referred to as the
14 “Directed Submission Sites.”

15 47. In summary, from August of 2024 through May of 2025 the Regional Water Board
16 continuously attempted to bring Sable’s Repair Plan for Lines 324 and 325 into regulatory
17 compliance under Section 13260. Throughout this period, the Regional Water Board identified
18 six locations where water quality impacts were evident, and the California Department of Fish
19 and Wildlife identified four additional sites where excavations could affect water quality. By
20 April 16, 2025, Sable had been directed to comply with waste discharge requirements at all ten of
21 these sites. In late May, the Regional Water Board identified additional sites where work required
22 permitting yet was completed without regulatory oversight. Nevertheless, it was not until August
23 19, 2025, a full year after Sable began implementation of its Repair Plan for Lines 324 and 325,
24 that Sable finally completed the assessment of water quality impacts from its numerous
25 excavations within the sensitive and important aquatic and riparian habitats within Santa Barbara
26 and San Luis Obispo Counties. Accordingly, the Regional Water Board brings this action on
27 behalf of the People for civil penalties associated with Sable’s blatant and knowing failure to first
28

1 obtain waste discharge requirements at any of the Directed Submission Sites before commencing
2 excavation work that could affect water quality.

3 **F. Sable's Continuing Refusal to Provide a Meaningful Technical Report**

4 48. Sable has continuously failed to meet its obligations under Section 13260 to identify
5 and permit excavations that could affect water quality. At each of the three site investigations
6 describe above, the Regional Water Board found excavations and associated activities that were
7 impacting or had impacted water quality. Accordingly, the Section 13267 Order was issued in
8 part to prompt Sable to perform the assessment necessary to identify other areas of concern and
9 provide information regarding the scope of waste discharge activity. Having been provided with a
10 detailed game plan for execution of this task in the Section 13267 Order, the 2025 Directive and
11 the follow-up April 2025 Notice of Violation, Sable's cursory and incomplete submissions still
12 missed the mark. Nevertheless, on June 11, 2025 Sable management took the position that its
13 obligation to provide a meaningful Technical Report was fulfilled.

14 49. Since Sable was unwilling to put in the work necessary to assess the environmental
15 impact of its Repair Plan for Lines 324 and 325, the Regional Water Board took on the task of
16 analyzing the information Sable provided and thereafter issued the July 24, 2025 Notice of
17 Violation for Failure to Report, Santa Barbara and San Luis Obispo County attached hereto as
18 Exhibit F (July 2025 Notice of Violation). This comprehensive order identified twenty-seven sites
19 where Sable's excavation and repair activities could affect water quality not previously addressed
20 in the Regional Water Board's previous investigations and associated Directives and Notices of
21 Violation. Once again, this work should have been done by Sable before commencing work in
22 August 2024; there is no excuse for Sable's failure to timely provide a Technical Report with this
23 information in response to the Section 13267 Order.

24 50. In the July 2025 Notice of Violation, the Regional Water Board provided further
25 detail on what information was necessary for each excavation site where work within and/or
26 adjacent to WOTS or WOTUS could affect water quality, including the specific location of
27 WOTS or WOTUS impacted, the quantity of earthen materials discharged and the sediment
28 remaining after backfilling, and a biological assessment of the WOTS or WOTUS identified as

1 within the zone of impact. Since Sable failed to provide this information before and as they were
2 doing the work, it was critical that Sable provide detailed historical information regarding the
3 excavation and repair so the Regional Water Board can provide adequate oversight regarding the
4 path forward to address continuing impacts to water quality. Sable cannot be allowed to avoid
5 regulatory oversight on the front-end of the Repair Plan for Lines 324 and 325 and then simply
6 assert the sites were backfilled, re-contoured, re-planted and all is now fine, despite continuing
7 impacts to water quality.

8 51. On August 13, 2025 Sable responded to the Regional Water Board's carefully crafted
9 directives in the July 2025 Notice of Violation. As alleged above, in the course of assessing the
10 Repair Plan for Lines 324 and 325 in retrospect, Sable identified nine sites requiring waste
11 discharge requirements that it had previously either overlooked or made incorrect determinations
12 regarding the impact of the excavations on water quality. Had Sable put in the effort by March 10,
13 2025 when the Technical Report required under the Section 13267 Order was first due, five
14 months of discharge to WOTS could have been identified and addressed. Even though the
15 majority of excavation was completed by March 10, 2025, Sable's delay identifying and assessing
16 the impact of its activities evaded regulatory oversight, delayed restoration work and therefore
17 warrants substantial penalties. More significantly, Sable's delay in responding to the Section
18 13267 Order was another cynical move to avoid waste discharge requirements and associated
19 involvement by the Regional Water Board that might delay meeting the July 1, 2025 deadline
20 imposed by the Fire Marshal.

21 **FIRST CAUSE OF ACTION**

22 **(Against all Defendants)**

23 **Failure to Timely Comply with Section 13267**

24 **(Wat. Code §§ 13267, 13268)**

25 52. Plaintiff re-alleges and incorporates herein by reference the allegations in paragraphs
26 1 through 51 inclusive of this Complaint.

27 53. The Section 13267 Order has five general components. First, it requires a description
28 of the repair work for Lines 324 and 325. Second, it requires Sable to locate and describe the

1 excavation activities to be undertaken as part of the that Repair Plan and whether they are
2 proximate to WOTS and WOTUS. Third, the Regional Water Board required Sable to assess the
3 scope and impact of discharges to WOTS and WOTUS, including a biological assessment needed
4 to fulfill the fourth requirement to identify actions to mitigate impacts to WOTS and WOTUS.
5 Finally, Sable was required to provide a plan to enhance its procedures for identifying sites where
6 waste discharge requirements must be implemented prior to executing the repair work.

7 54. The Regional Water Board's requirement that Sable describe its work and locate and
8 identify the WOTS and WOTUS within the Repair Plan for Lines 324 and 325, is fundamental
9 and straightforward. This task should have been done well before the August 2024 start date. To
10 the extent it was not, the location of streams, channels and drainage along Sable's pipeline route
11 is something any responsible operator should have at their fingertips. Nevertheless, it took months
12 after the Section 13267 Order deadline of March 10, 2025 and two detailed Notices of Violation
13 for Sable to adequately identify areas disturbed by its excavation activities that could affect the
14 quality of WOTS or WOTUS.

15 55. The Regional Water Board's requirements that Sable provide a detailed assessment of
16 waste discharges that could affect water quality and a plan to address the impacts of such
17 discharges are two more directives that never should have been necessary components of the
18 Section 13267 Order. However, given Sable's ongoing evasion of regulation, the Regional Board
19 required the issues be addressed in a technical report. To the extent these requirements came to
20 the attention of any responsible environmental management, the response should have been swift
21 and comprehensive. Not so with Sable. Its March 7, 2025 response only revealed just how
22 uninformed and unprepared Sable had been regarding environmental compliance when executing
23 its Repair Plan. The belated response of April 15, 2025 insufficiently addressed only four sites
24 with only a cursory assessment of impacts when, in fact, at least ten more impacted sites
25 remained unidentified.

26 56. Sable's failure to take the information at hand – the location and nature of its
27 excavation work – and assess the potential impact to water quality put the Regional Water Board
28 in the position of having to do Sable's work for it. After performing additional investigation, the

1 Regional Water Board issued its July 24, 2025 Notice of Violation giving Sable notice of those
2 locations for which the Regional Water Board suspected required assessment in line with the
3 directives of the Section 13267 Order yet was missing from Sable's insufficient response. It was
4 only after receiving the Regional Water Board's analysis, which Sable should have performed in
5 the first instance, that Sable disclosed nine more sites where its work could affect water quality.
6 Importantly, mitigation at those sites has yet to be implemented. Sable's cynical and unwarranted
7 delay prevented the Regional Water Board from identifying and addressing water quality impacts
8 at these sites and assuring Sable used best management practices to timely mitigate impacts.
9 Accordingly, the imposition of civil liability under Water Code section 13268 is warranted for
10 each day Sable failed to adequately respond to the Section 13267 Order for Technical Report
11 when due on March 10, 2025.

12 **SECOND CAUSE OF ACTION**

13 **(Against all Defendants)**

14 **Failure to File Report of Proposed Waste Discharge**

15 **(Wat. Code §§ 13260, 13261)**

16 57. Plaintiff re-alleges and incorporates herein by reference the allegations in paragraphs
17 1 through 56 inclusive of this Complaint.

18 58. As alleged in detail above, Sable cynically refused to obtain waste discharge
19 requirements at the Directed Submission Sites until the excavation work was completed so as to
20 avoid delay and impede the Regional Water Board's ability to provide input into the application
21 of best management practices to address impacts to water quality. Indeed, prior to commencing
22 work on the Repair Plan for Lines 324 and 325, Sable management misinformed the Regional
23 Water Board by assuring staff that Sable had assessed how its excavation work could affect water
24 quality. Sable's response to the Section 13267 Order demonstrated Sable's V.P. of Environmental
25 Management was at best misinformed, incompetent and incorrect. At worst, Sable was simply
26 bamboozling the Regional Water Board to meet a critical deadline. Either way, substantial
27 penalties are warranted for Sable's egregious conduct.
28

59. The Regional Water Board alleges that it provided Sable with adequate notice under Water Code section 13260 when: (a) staff advised Mr. Rusch of the need to obtain waste discharge requirements for any excavation in its Repair Plan for Lines 324 and 325 that could affect water quality and Sable management Mr. Rusch acknowledged such in writing; and, (b) Regional Water Board followed up with the 2024 Directive identifying the process it expected Sable to follow at any site where excavation could affect water quality.

60. The Regional Water Board is unaware of the dates upon which Sable first proposed to discharge excavated fill and/or remove vegetation at the Directed Submission Sites identified above. The Regional Water Board alleges that at the time Sable planned its excavation and repair activity at each Directed Submission Site, it knew or should have known that a Section 13260 permit was required yet decided not to apply for coverage under the Water Quality Orders identified above. As set forth in paragraph 59 above, on the date of the 2024 Directive Sable was notified by the Regional Water Board of the need to comply with Section 13260 and associated regulations. Accordingly, penalties should be assessed according to proof at each Directed Submission Site from that date, or from the date when Sable's work was first proposed thereafter, until a complete Notice of Intent was submitted to the Regional Water Board as set forth above.

THIRD CAUSE OF ACTION

(Against all Defendants)

Ongoing Unlawful Waste Discharges

(Wat. Code §§ 13264, 13265)

61. Plaintiff re-alleges and incorporates herein by reference the allegations in paragraphs 1 through 60 inclusive of this Complaint.

62. As alleged in Paragraph 12 above, Water Code section 13264 prohibits Sable from initiating any new discharge of waste or making any material changes in any discharge *prior to* the filing of the report required by Section 13260. That statute also prohibits such action *after* filing the report as follows: “no person shall take any of these actions after filing the report but before whichever of the following occurs first: (1) The issuance of waste discharge requirements pursuant to Section 13263; (2) The expiration of 140 days after compliance with Section

1 13260 . . . ; (3) The issuance of a waiver pursuant to Section 13269.” As alleged herein, while
2 Sable provided Notices of Intent proposing to discharge waste, it continued its disruptive
3 activities before receiving waste discharge requirements in violation of Section 13264.

4 63. Water Code section 13265 subdivision (a) provides: “Any person discharging waste
5 in violation of Section 13264, after such violation has been called to his attention in writing by
6 the regional board, is guilty of a misdemeanor and may be liable civilly in accordance with
7 subdivision (b). Each day of such discharge shall constitute a separate offense.” As alleged
8 herein, the Regional Water Board began “calling to Sable’s attention in writing” its concerns over
9 discharges emanating from the planned repairs to Lines 324 and 325 as early as August of 2024,
10 and Sable acknowledged such in writing at that time. The Regional Water Board continued
11 diligently calling its concerns over proposed and actual discharges to Sable in writing over the
12 ensuing months, including two specific directives and notices of violation. Having satisfied the
13 notice requirements of Section 13265 on multiple occasions, the Regional Water Board is entitled
14 to recover civil penalties from the date each of the discharges identified below began following
15 notice to Sable as alleged herein.

16 64. A new discharge of waste was initiated by Sable at each of the Directed Submission
17 Sites identified in this Third Cause of Action as of the date excavation activities commenced. For
18 the Baron Ranch Trailhead Site, such unlawful discharge was ongoing from the date excavation
19 commenced until March 20, 2025 when the Regional Water Board issued a Notice of
20 Applicability establishing waste discharge requirements. The Regional Water Board is unaware
21 of the date such discharge commenced and reserves the right to amend this Complaint according
22 to proof.

23 65. Unlawful discharges at the Cayuma River Tributary Site, Peterson Creek Tributary
24 Site, Nojoqui Creek Tributary Site, and Foxen Canyon Tributary Site began at the time Sable
25 commence excavation at each of these sites and continued until June 2, 2025 when the Regional
26 Water Board issued Notices of Applicability for these sites establishing waste discharge
27 requirements. The Regional Water Board is unaware of the dates such discharges commenced and
28 reserves the right to amend this Complaint according to proof.

66. The unlawful discharges at the Arroyo Quemado Site, Cañada de Leon Site, Zorillas Drainage F7 Site, Zorillas Drainage F8 Site, Grey Fox Ranch Site, Cañada de la Gallina Site, and Cañada de la Gaviota Site began at the time Sable commenced excavation at each of these sites and remain unpermitted and are ongoing as of the date of this Complaint. The Regional Water Board is unaware of the dates such discharges commenced and reserves the right to amend this Complaint to allege the period of unlawful discharges at each of these sites according to proof.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff requests that the Court enter judgment in favor of Plaintiff and against Defendants as follows:

i. For and award of civil penalties according to proof for the multiple violations of the Porter-Cologne Water Quality Act set forth in the First, Second and Third Causes of Action;

ii. For the award of investigative and litigation costs, expert fees, attorney fees and all other expenditures incurred by Plaintiff in the prosecution of this action recoverable pursuant to Code of Civil Procedure section 1028.1; and

iii. For such other and further relief according to proof that the Court deems just and proper.

Dated: October 3, 2025

Respectfully submitted,

ROB BONTA
Attorney General of California

Wm H. Z.

MICHAEL T. ZARRO
Deputy Attorney General
*Attorneys for Plaintiff People of the State of
California ex rel. Regional Water Quality
Control Board, Central Coast Region*

EXHIBIT A



Central Coast Regional Water Quality Control Board

December 13, 2024

Sable Offshore Corp
Steven Rusch, Vice President
845 Texas Avenue, Ste 2920
Houston, Texas 77002
Email: SRusch@sableoffshore.com

**VIA CERTIFIED MAIL AND EMAIL
RETURN RECEIPT REQUESTED
7019 1640 0000 7902 1384**

Sable Offshore Corp
Amanda Garcia
Agent for Service of Process
330 N Brand Blvd
Glendale, CA 91203

**VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED
7019 1640 0000 7902 2381**

Dear Steven Rusch:

ENFORCEMENT PROGRAM: SABLE OFFSHORE CORP, SANTA BARBARA COUNTY - DIRECTIVE TO OBTAIN REGULATORY COVERAGE FOR UNAUTHORIZED DISCHARGE OF WASTE TO WATERS OF THE STATE, SANTA BARBARA COUNTY

This letter contains legal directives that must be followed. Failure to respond may result in fines.

Sable Offshore Corp is receiving this letter because the Central Coast Regional Water Quality Control Board (Central Coast Water Board) has evidence of unauthorized discharge of waste to waters of the state at an ephemeral stream in Santa Barbara County located at approximately 34° 28' 6.4" N, 120° 06' 22.5" W, upstream of Hwy 101 at postmile 39, just east of Baron Ranch Trailhead. The evidence of unauthorized discharge of waste to waters of the state is described in our December 13, 2024 notice of violation.

Discharge of waste to waters of the state requires submittal of a report of waste discharge and receipt of waste discharge requirements prior to discharge. California Water Code section 13260 requires any person discharging waste, or proposing to discharge waste, within any region that could affect the quality of waters of the state, to file with the appropriate regional board a report of the discharge. California Water Code section 13264 states in part that no person shall initiate any new discharge of waste or make any material changes in any discharge prior to the filing of the report required by California Water Code section 13260.

JANE GRAY, CHAIR | RYAN E. LODGE, EXECUTIVE OFFICER

The Central Coast Water Board requires that Sable obtain regulatory coverage for its discharge of waste **within 30 calendar days of the date this letter**. The discharge of sediment directly to the ephemeral stream constitutes a discharge of fill material to waters of the state and is therefore subject to regulation by the *Statewide General Waste Discharge Requirements for Dredge or Fill Discharges to Waters Deemed by the U.S. Army Corps of Engineers to be Outside Federal Jurisdiction (WQO 2004-0004)*.¹

To obtain regulatory coverage Sable must:

1. Submit a completed Notice of Intent (Attachment 1 of WQO 2004-0004).
2. Comply with the requirements of WQO 2004-0004, including monitoring and reporting.

Failure to take these actions may subject Sable Offshore Corp to enforcement action by the Central Coast Water Board, including administrative civil liability of up to \$1,000 per day for each day the violation occurs, pursuant to California Water Code section 13261. Administrative civil liability may be imposed by the superior court up to \$5,000 per day for each day the violation occurs, pursuant to California Water Code section 13261. Pursuant to California Water Code section 13265, civil liability may be imposed by the Central Coast Water Board in an amount of up to \$1,000 per day for violation of California Water Code section 13264. Pursuant to California Water Code section 13265, civil liability may be imposed by the superior court in an amount of up to \$5,000 per day for violation of California Water Code section 13264. If penalties are imposed, the regulatory coverage is still required.

Central Coast Water Board staff's recommendations for further enforcement will depend on Sable's response to this letter. The Central Coast Water Board may also require cleanup and abatement of the effects of the unauthorized activities pursuant to California Water Code section 13304, or that Sable immediately cease and desist from the activities pursuant to California Water Code section 13301. The Central Coast Water Board reserves the right to take any enforcement action authorized by law.

Any person aggrieved by this action of the Central Coast Water Board may petition the State Water Resources Control Board to review the action in accordance with California Water Code section 13320 and California Code of Regulations, title 23, sections 2050 and following. The State Water Resources Control Board must receive the petition by 5:00pm, 30 days after the date of this directive, except that if the thirtieth day following the date of this Order falls on a Saturday, Sunday, or state holiday (including mandatory furlough days), the petition must be received by the State Water Resources Control Board by 5:00pm on the next business day. Copies of the law and regulations applicable to filing petitions may be found on the Internet at: https://www.waterboards.ca.gov/public_notices/petitions/water_quality/ or will be provided upon request.

¹ https://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2004/wqo/wqo2004-0004.pdf

If you have questions about this letter, please contact April Woods at April.Woods@waterboards.ca.gov or Phil Hammer at Phillip.Hammer@waterboards.ca.gov.

Sincerely,

Thea S. Tryon  Digitally signed by Thea S. Tryon
Date: 2024.12.13 10:42:51 -08'00'

Thea S. Tryon
Assistant Executive Officer

cc:

Stephanie Cook, California Coastal Commission, Stephanie.Cook@coastal.ca.gov
Wesley Horn, California Coastal Commission, Wesley.Horn@coastal.ca.gov
Errin Briggs, Santa Barbara County Planning & Development, EBriggs@countyofsb.org
Jim Hosler, CAL FIRE, Jim.Hosler@fire.ca.gov
Julie Vance, California Department of Fish and Wildlife, Julie.Vance@wildlife.ca.gov
Linda Connolly, California Department of Fish and Wildlife,
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Naomi Rubin, State Water Resources Control Board,
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April Woods, Central Coast Water Board, April.Woods@waterboards.ca.gov
Jesse Woodard, Central Coast Water Board, Jesse.Woodard@waterboards.ca.gov
Jacqueline Tkac, Central Coast Water Board, Jacqueline.Tkac@waterboards.ca.gov

EXHIBIT B

Central Coast Regional Water Quality Control Board

December 13, 2024

Sable Offshore Corp
Steven Rusch, Vice President
845 Texas Avenue, Ste 2920
Houston, Texas 77002
Email: SRusch@sableoffshore.com

**VIA CERTIFIED MAIL AND EMAIL
RETURN RECEIPT REQUESTED
7020 1810 0002 0768 8031**

Sable Offshore Corp
Amanda Garcia
Agent for Service of Process
330 N Brand Blvd
Glendale, CA 91203

**VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED
7019 1640 0000 7902 2374**

Dear Steven Rusch:

ENFORCEMENT PROGRAM: SABLE OFFSHORE CORP, SANTA BARBARA COUNTY - NOTICE OF VIOLATION FOR UNAUTHORIZED DISCHARGE OF WASTE TO WATERS OF THE STATE, SANTA BARBARA COUNTY

The California Regional Water Quality Control Board, Central Coast Region (Central Coast Water Board) is a state regulatory agency with responsibility for protecting the quality of the waters of the state within its area of jurisdiction. The Central Coast Water Board has authority to require submission of information, direct action, establish regulations, levy penalties, and bring legal action when necessary to protect water quality.

The Central Coast Water Board has evidence of unauthorized discharge of waste to waters of the state at an ephemeral stream in Santa Barbara County located at approximately 34° 28' 6.4" N, 120° 06' 22.5" W, upstream of Hwy 101 at postmile 39, just east of Baron Ranch Trailhead. The unauthorized discharge of waste is a potential violation of the California Water Code. This notice of violation describes the alleged violation, summarizes potential monetary liability, and provides direction on corrective actions.

Summary

In August 2024, Central Coast Water Board staff were made aware of pipeline remediation work along Sable Offshore Corp.'s (Sable) Line 324 (formerly Line 901) and Line 325 (formerly Line 903) along the Gaviota Coast in Santa Barbara County. At that time, Central Coast Water Board staff April Woods contacted Sable representative Steve Rusch to inquire about the potential for project impacts to waters of the state.

JANE GRAY, CHAIR | RYAN E. LODGE, EXECUTIVE OFFICER

Central Coast Water Board staff informed Steve Rusch that intermittent and ephemeral streams are waters of the state. Mr. Rusch confirmed his knowledge of the regulatory requirements and confirmed Sable had surveyed all work locations and found no project impacts to waters of the state.

In early October 2024, the Central Coast Water Board received a citizen complaint of multiple land disturbances across what appeared to be waters of the state on the Gaviota Coast at various Sable pipeline remediation project sites. April Woods again contacted Mr. Rusch and requested access to the project site to conduct an inspection.

California Water Code section 13050 defines waters of the state as “any surface water or groundwater, including saline waters, within the boundaries of the state.” Surface waters of the state include but are not limited to wetlands; perennial, intermittent, and ephemeral streams; rivers; lakes; bays; and coastal ocean waters. Ephemeral streams collect, contain, and transport water on the surface of the landscape and are therefore surface waters of the state. As an example, the Statewide General Waste Discharge Requirements for Dredged or Fill Discharges to Waters Deemed by the U.S. Army Corps of Engineers to be Outside of Federal Jurisdiction (General WDRs WQO 2004-0004) determines that headwaters, defined as intermittent and ephemeral drainages, constitute waters of the state.¹

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 the following evidence demonstrating the drainage feature located at approximately 34° 28' 6.4" N, 120° 06' 22.5" W is an ephemeral stream and a water of the state:

1. Fluvial geomorphological features, including a visibly identifiable bed and bank, were observed in the drainage feature. The bed was composed of stone and pebbles, while a bench of stone, cobble, and sediment distinguished the bank from the bed. The stone and cobble in the bed were deposited and distributed in a manner that results from hydrologic flows. These characteristics indicate the drainage feature regularly transports surface water, demonstrating it is an ephemeral stream and surface water of the state.
2. Scour and detritus were observed in the drainage feature. These conditions indicate repeated and regular flow and are characteristic of an ephemeral stream and surface water of the state.
3. Dry vegetation, concentrated in the channel and on the banks of the tributary, was in greater abundance than surrounding uplands. The reed grass *Arundo donax* was abundant on the banks and headwaters of the channel. While not an obligate wetland species, *Arundo donax* is a species that thrives in streams. Its distribution here, concentrated at the top of the ephemeral stream and within the channel, indicates regular saturation of the drainage feature, further

¹ https://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2004/wqo/wqo2004-0004.pdf

demonstrating the drainage feature is an ephemeral stream and surface water of the state.

In addition to field observations, Central Coast Water Board staff identified the following information indicating the drainage feature is an ephemeral stream and surface water of the state:

1. Historic aerial imagery confirms the presence of a sinuous channel bed path along the length of the drainage. In addition, the imagery shows diverse, robust, and green vegetation within the drainage feature when surrounding areas are dry and brown.
2. The drainage is identified as "Riverine Wetland" on the U.S. Fish and Wildlife Wetland Mapper.

During the site inspection, Central Coast Water Board staff observed and documented the following activities at the ephemeral stream located at approximately 34° 28' 6.4" N, 120° 06' 22.5" W:

1. A temporary access road had been constructed across the bed and bank of the ephemeral stream. The construction of the earthen road discharged sediment to the ephemeral stream. The discharge of sediment to the ephemeral stream constitutes a discharge of waste to waters of the state.
2. A pit had been excavated across the bed and bank of the ephemeral stream to access an underground pipeline. Excavation and grading appeared to have occurred on the ephemeral stream's slopes and in the streambed. The excavation and grading discharged sediment to the ephemeral stream. The discharge of sediment to the ephemeral stream constitutes a discharge of waste to waters of the state.
3. Cut and fill from excavation was mounded in contoured slopes adjacent to the banks of the ephemeral stream without implementation of erosion or sediment controls. Uncontrolled sediment is a discharge of waste that could affect the quality of waters of the state.
4. Vegetation had been cleared from the bed and banks of the ephemeral stream without implementation of erosion or sediment controls. Areas of cleared vegetation have the potential to result in the discharge of waste that could affect the quality of waters of the state.

Alleged Violations

1. Violation of California Water Code Section 13260

California Water Code section 13260 requires any person discharging waste, or proposing to discharge waste, within any region that could affect the quality of waters of the state, to file with the appropriate regional board a report of the discharge. The conditions at the project represent a violation of California Water Code section 13260, because Sable cleared vegetation and excavated and

graded sediment in the unnamed tributary, constituting a discharge of waste to waters of the state, without having filed the required report of waste discharge.

2. Violation of California Water Code Section 13264

California Water Code section 13264 states in part that no person shall initiate any new discharge of waste or make any material changes in any discharge prior to the filing of the report required by California Water Code section 13260. The conditions at the Site represent a violation of California Water Code section 13264, because Sable discharged waste that could affect the quality of waters of the state without obtaining waste discharge requirements from the Central Coast Water Board.

Required Corrective Actions

To address the alleged violations, Sable can obtain all required authorizations for work conducted and any corrective restoration and compensatory mitigation activities. Sable must take action to correct the alleged violations as soon as possible to avoid formal enforcement.

The Central Coast Water Board will be sending Sable a separate directive pursuant to California Water Code section 13260 requiring Sable to submit a report of waste discharge for the discharges of waste identified above. In addition, also under separate cover, the Central Coast Water Board will be sending Sable a directive pursuant to California Water Code section 13267 requiring Sable to submit a technical report describing the work Sable has conducted and/or is conducting for Line 324 (formerly Line 901) and Line 325 (formerly Line 903). The Central Coast Water Board also finds that Sable's work is likely subject to regulation under the *National Pollutant Discharge Elimination System General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities Order WQ 2022-0057-DWQ*² and expects to send Sable additional communication on that issue.

To avoid further unauthorized discharges during any restoration and compensatory mitigation implementation in waters of the state or waters of the United States, pursuant to California Water Code sections 13260 and 13376, Sable must apply for and obtain waste discharge requirements from the Central Coast Water Board prior to any material removal, new disturbance, or restoration activity.

Potential Enforcement Actions

The alleged violation cited above may subject Sable to enforcement by the Central Coast Water Board for every day the violations continue. Sable must correct the violation as soon as possible. Sable's receipt of this notice of violation does not

2

https://www.waterboards.ca.gov/water_issues/programs/stormwater/construction/general_permit_reissuance.html

preclude the Central Coast Water Board from taking further enforcement action for the alleged violations cited in this notice of violation, and the Central Coast Water Board reserves the right to take any enforcement action authorized by law. In making its determination of whether and how to proceed with further enforcement action, the Central Coast Water Board will consider the information submitted in response to this notice of violation, the time it takes to correct the identified violations, and the adequacy of the corrections and actions taken.

Central Coast Water Board staff's recommendations for further enforcement will depend on Sable's response to this notice of violation. The Central Coast Water Board may also require cleanup or abatement of the effects of the unauthorized activities pursuant to California Water Code section 13304, or that Sable immediately cease and desist from the activities pursuant to California Water Code section 13301. The Central Coast Water Board reserves the right to take any enforcement action authorized by law.

If you have questions about this letter, please contact April Woods at April.Woods@waterboards.ca.gov or Phil Hammer at Phillip.Hammer@waterboards.ca.gov.

Sincerely,

Thea S. Tryon  Digitally signed by Thea S. Tryon
Date: 2024.12.13 10:45:05 -08'00'

Thea S. Tryon
Assistant Executive Officer

cc:

Stephanie Cook, California Coastal Commission, Stephanie.Cook@coastal.ca.gov
Wesley Horn, California Coastal Commission, Wesley.Horn@coastal.ca.gov
Errin Briggs, Santa Barbara County Planning & Development, EBriggs@countyofsb.org
Jim Hosler, CAL FIRE, Jim.Hosler@fire.ca.gov
Julie Vance, California Department of Fish and Wildlife, Julie.Vance@wildlife.ca.gov
Linda Connolly, California Department of Fish and Wildlife,
Linda.Connolly@wildlife.ca.gov
Naomi Rubin, State Water Resources Control Board,
Naomi.Rubin@waterboards.ca.gov
Thea Tryon, Central Coast Water Board, Thea.Tryon@waterboards.ca.gov
Todd Stanley, Central Coast Water Board, Todd.Stanley@waterboards.ca.gov
Harvey Packard, Central Coast Water Board, Harvey.Packard@waterboards.ca.gov
Phil Hammer, Central Coast Water Board, Phillip.Hammer@waterboards.ca.gov
Tamara Anderson, Central Coast Water Board, Tamara.Anderson@waterboards.ca.gov
Leah Lemoine, Central Coast Water Board, Leah.Lemoine@Waterboards.ca.gov
April Woods, Central Coast Water Board, April.Woods@waterboards.ca.gov
Jesse Woodard, Central Coast Water Board, Jesse.Woodard@waterboards.ca.gov
Jacqueline Tkac, Central Coast Water Board, Jacqueline.Tkac@waterboards.ca.gov

File Path: R:\RB3\Shared\401\Enforcement Actions&Violations_Santa Barbara Co\Sable Offshore Corp\NOV\Sable Offshore Corp
NOV_final.docx

EXHIBIT C



Central Coast Regional Water Quality Control Board

January 22, 2025

Sable Offshore Corp.
Steven Rusch, Vice President
845 Texas Avenue, Ste 2920
Houston, Texas 77002
Email: SRusch@sableoffshore.com

**VIA CERTIFIED MAIL AND EMAIL
RETURN RECEIPT REQUESTED
7020 1810 0002 0767 9350**

Sable Offshore Corp.
Amanda Garcia
Agent for Service of Process
330 N Brand Blvd
Glendale, CA 91203

**VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED
7020 1810 0002 0767 9367**

**ENFORCEMENT PROGRAM: SABLE OFFSHORE CORP., LAS FLORES PIPELINE
SYSTEM REMEDIATION OPERATIONS, SANTA BARBARA, SAN LUIS OBISPO,
AND KERN COUNTIES – CALIFORNIA WATER CODE SECTION 13267
REQUIREMENT TO SUBMIT A TECHNICAL REPORT ASSOCIATED WITH
DISCHARGE OF EARTHEN MATERIAL TO WATERS OF THE STATE**

Dear Steven Rusch:

The California Regional Water Quality Control Board, Central Coast Region (Central Coast Water Board) is a state regulatory agency with responsibility for protecting the quality of the waters of the state within its area of jurisdiction. The Central Coast Water Board has authority to require submission of information, direct action, establish regulations, levy penalties, and bring legal action when necessary to protect water quality.

The Central Coast Water Board has evidence of unauthorized discharges of waste to waters of the state by Sable Offshore Corp. (Sable) associated with Las Flores Pipeline System Lines 324 (formerly Line 901) and 325 (formerly Line 903) remediation activities. The notice of violation (NOV), notice of non-compliance (NNC), and directive to obtain regulatory coverage for unauthorized discharge of waste to waters of the state issued to Sable on December 13, 2024, include descriptions of the alleged violations associated with the unauthorized discharges of waste to waters of the state. Pursuant to California Water Code section 13267, this order requires Sable to submit a technical report as described in further detail below.

JANE GRAY, CHAIR | RYAN E. LODGE, EXECUTIVE OFFICER

California Water Code Section 13267 Order for Technical Report

California Water Code section 13267 authorizes the Central Coast Water Board to require any person who has discharged, discharges, or is suspected of having discharged or discharging, or who proposes to discharge waste within the region to furnish, under penalty of perjury, technical or monitoring reports to investigate the quality of any waters of the state.

Required Technical Report

For the purposes of investigating the alleged violations identified in the December 13, 2024 NOV, NNC, and directive and assessing the threat to water quality resulting from suspected ongoing discharges, the Central Coast Water Board requires Sable to submit a technical report describing Sable's discharges and associated impacts to waters of the state and plans for correcting the alleged violations, preventing future violations, and remediating impacts from the discharges. Within **45 days** of the date of this letter, Sable must submit a technical report that contains, at a minimum, the following:

1. A detailed description of the scope and purpose of work Sable has performed, is performing, or is planning to perform on lines 324 and 325.
2. An inventory of all Sable land disturbance activities that were or are currently active in the Central Coast region pertaining to remediation of the Las Flores Pipeline System lines.¹ The inventory must include the following information:
 - a. Location of each land disturbance activity, including geographic coordinates.
 - b. Area of land, in acres, disturbed by each land disturbance activity, including access roads, laydown yards, construction corridors, and staging areas, including any vegetation management or tree removal in support of the development of these facilities or construction of new facilities resulting from compliance with applicable codes, standards, and regulations.
 - c. Description of each land disturbance activity conducted.
 - d. Location of each land disturbance activity, including geographic coordinates, in relation to boundaries of the existing right-of-way, franchise, easements, or agreements. Area of land, in acres, disturbed by each land disturbance activity outside of existing right-of-way, franchise, easements, or agreements.
 - e. A description of any citations, notices of noncompliance, notices of violation, or similar enforcement actions issued by regulatory agencies for violations related to any land disturbing activities.
 - f. For each land disturbance activity, a detailed assessment of the presence of any of the following in or adjacent to the disturbed area: wetlands; perennial, intermittent, or ephemeral streams; rivers; lakes; swales; drainages; ditches; or any other depressional features with evidence of bed, bank, or channel.

¹ Remediation of the Las Flores Pipeline System lines includes work by Sable Offshore Corp. begun in 2024 on Lines 324/325 (previously 901/903) along the entirety of the 124-mile pipeline conducted in anticipation of restarting use of the line.

3. A detailed assessment of waste discharge to surface waters resulting from Sable's Las Flores Pipeline System line remediation work activities, including:
 - a. An identification of the locations and sizes of the areas of waters of the state and waters of the U.S. affected by the unauthorized waste discharges.
 - (1) Quantify areas of disturbance in units of acres and linear feet.
 - (2) Quantify discharges to waters of the state in cubic yards.
 - b. An estimate of the amount of waste discharged, in gallons or cubic yards as applicable, to waters of the state resulting from Sable's Las Flores Pipeline System line remediation activities, including an estimate of the amount of sediment remaining in sediment stockpile areas and ephemeral drainages that have the potential to be discharged to downstream reaches.
 - c. A biological assessment of the areas of the waters of the state impacted by the waste discharges resulting from Sables's pipeline remediation activities, including a description of impacted riparian and aquatic habitats and an assessment of their quality.
4. A detailed description of actions Sable can take to mitigate impacts to water quality and beneficial uses of waters of the state caused by the discharge of waste resulting from Sable's pipeline remediation activities, including onsite restoration and offsite compensatory mitigation options.
5. A plan for how Sable will update and enhance its policies and procedures to identify waters of the state in proposed work areas and avoid discharging waste to waters of the state without proper authorization. Include the following information in the plan:
 - a. Steps Sable will take to assess if a proposed activity has the potential to discharge waste to waters of the state.
 - b. Steps Sable will take to identify if a proposed activity requires authorization from the Central Coast Water Board.
 - c. Steps Sable will take to contact the Central Coast Water Board if a proposed activity has the potential to require authorization from the Central Coast Water Board.
 - d. Steps Sable will take to obtain all required authorizations for future discharges of waste to waters of the state, such as programmatic waste discharge requirements for discharges occurring at multiple locations or individual waste discharge requirements for each discharge occurring at an individual location.
6. Pursuant to California Water Code section 13267(b)(1), the following perjury statement, signed by a duly authorized representative: "I, [NAME], certify under penalty of law that this document and all attachments were prepared by me, or under my direction or supervision, and the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant civil penalties for submitting false information."

The Central Coast Water Board is requiring Sable to submit the technical report because Sable is suspected of having discharged and continuing to discharge waste to waters of the state in the Central Coast region. The evidence supporting the need for this technical report is discussed in the December 13, 2024 NOV, NNC, and directive. The technical report is necessary to obtain information to fully delineate the extent of

actual and potential adverse impacts to water quality and beneficial uses caused by the discharges, determine compliance with water quality objectives and prohibitions in the Water Quality Control Plan for the Central Coastal Basin (Basin Plan),² and identify corrective actions.

Based on information available to Central Coast Water Board staff, which includes relevant professional experience, preparation of the technical report will require a combination of professionals including registered professional geologists and engineers. It is estimated that the preparation of the technical report will take approximately 60-80 hours to complete, and, using an average hourly rate of \$190, the estimated cost to prepare the technical report is \$11,400-\$15,200. For additional details on the calculation of these costs, see Attachment 1.

As identified in the October 5, 2020 Biological Resources Assessment (2nd Revised) prepared by SCS Engineers³ for the since-abandoned Line 901 & Line 903 Replacement Project, the 124-mile-long pipeline is crossed by at least 141 identified waters of the state. As reported in the above referenced assessment, water crossings within the potentially impacted project area include “coastal creeks with well-established riparian habitat, drainages and swales with herbaceous vegetation through rolling coastal and Sierra Madre hillsides, [and] alluvial fans with braided channels of riverwash in the Sisquoc River and in the Cuyama Valley to the San Joaquin Valley.” Additionally, creeks and drainages within the project footprint act as tributaries to three large river systems—the Santa Ynez, Sisquoc, and Cuyama Rivers. Special status botanical resources and wildlife, protected as beneficial uses in the Basin Plan, have the potential to exist throughout the project footprint. After consideration of these factors, staff has determined that the burden, including costs, of submitting the technical report bears a reasonable relationship to the need for the report and the benefits to be obtained from the report because of the potential for harm to water quality and beneficial uses resulting from the suspected unauthorized discharges and other potential discharges.

Process for Submitting Required Technical Report

Sable must submit the technical report in a searchable Portable Document Format (PDF) to April Woods at April.Woods@Waterboards.ca.gov and centralcoast@waterboards.ca.gov.

Documents less than 50 MB must be sent via electronic mail and include “Submittal of Required Documents” in the subject line of the e-mail. Documents that are 50 MB or larger must be transferred to a disk and mailed to:

Central Coast Water Board

² https://www.waterboards.ca.gov/centralcoast/water_issues/programs/basin_plan/

³ Biological Assessment available at <https://www.countyofsb.org/3801/901903-Replacement-Pipeline-Project>

Attention: April Woods
895 Aerovista Place, Suite 101
San Luis Obispo, CA 93401-7906

Liabilities

California Water Code section 13268 provides that failure to submit the information required by subdivision (b) of section 13267 by the specified compliance date, or falsifying any information provided therein, is a misdemeanor and may result in civil liability. Noncompliance may subject you to civil liability in the amount of up to \$1,000 for each day of violation. If the Central Coast Water Board elects to refer the matter to the Attorney General, the superior court may impose civil liability for up to \$5,000 per day for each violation. Compliance with this order is not a substitute for compliance with other applicable laws. The Central Coast Water Board reserves the right to take any enforcement action authorized by law.

Petitioning this Order

Any person aggrieved by this action of the Central Coast Water Board may petition the State Water Resources Control Board (State Water Board) to review the action in accordance with California Water Code section 13320 and California Code of Regulations, title 23, sections 2050 et seq. The State Water Board must receive the petition by 5:00 p.m., 30 days after the date that this Order becomes final, except that if the thirtieth day following the date that this Order becomes final falls on a Saturday, Sunday, or state holiday (including mandatory furlough days), the petition must be received by the State Water Board by 5:00 p.m. on the next business day. Copies of the law and regulations applicable to filing petitions may be found at the following address or will be provided upon request:

http://www.waterboards.ca.gov/public_notices/petitions/water_quality

If you have questions about this letter please contact April Woods at (805) 549-3332 or April.Woods@waterboards.ca.gov, or Phil Hammer at Phillip.Hammer@waterboards.ca.gov.

Sincerely,

Thea S. Tryon  Digitally signed by Thea S. Tryon
Date: 2025.01.22 08:09:57 -08'00'

Thea S. Tryon
Assistant Executive Officer

cc:

Stephanie Cook, California Coastal Commission, Stephanie.Cook@coastal.ca.gov
Wesley Horn, California Coastal Commission, Wesley.Horn@coastal.ca.gov

Errin Briggs, Santa Barbara County Planning & Development, EBriggs@countyofsb.org
Jim Hosler, CAL FIRE, Jim.Hosler@fire.ca.gov
Julie Vance, California Department of Fish and Wildlife, Julie.Vance@wildlife.ca.gov
Linda Connolly, California Department of Fish and Wildlife,
Linda.Connolly@wildlife.ca.gov
Morgan Lucas, Santa Barbara County District Attorney's Office,
mlucas@countyofsb.org
Christopher Dalbey, Santa Barbara County District Attorney's Office,
cdalbey@countyofsb.org
Robert Parmelee, Santa Barbara County District Attorney's Office,
rparmelee@countyofsb.org
Naomi Rubin, State Water Resources Control Board,
Naomi.Rubin@waterboards.ca.gov
Thea Tryon, Central Coast Water Board, Thea.Tryon@waterboards.ca.gov
Todd Stanley, Central Coast Water Board, Todd.Stanley@waterboards.ca.gov
Harvey Packard, Central Coast Water Board, Harvey.Packard@waterboards.ca.gov
Phil Hammer, Central Coast Water Board, Phillip.Hammer@waterboards.ca.gov
Tamara Anderson, Central Coast Water Board, Tamara.Anderson@waterboards.ca.gov
Leah Lemoine, Central Coast Water Board, Leah.Lemoine@Waterboards.ca.gov
April Woods, Central Coast Water Board, April.Woods@waterboards.ca.gov
Jesse Woodard, Central Coast Water Board, Jesse.Woodard@waterboards.ca.gov
Jacqueline Tkac, Central Coast Water Board, Jacqueline.Tkac@waterboards.ca.gov

Estimated Cost to Prepare Technical Report Sable Offshore Corp

Required Technical Report Cost Analysis

The cost estimates provided in the January 22, 2025 order for technical report were calculated by estimating the approximate hours required to complete the technical report and multiplying by an average hourly rate for professional services. Professional services required for the technical report would likely vary and include a range of registered professional engineers and geologists, surveyors, and other technical persons. Taking into consideration the variety of professionals involved and based upon research into publicly available rate charge data (references below), staff determined an average hourly charge rate of \$135-190.

Hourly Charge Rate Calculation

See references below for sources of hourly rates. While the sourced hourly rates are not local to the Central Coast, they are representative of statewide costs based on Central Coast Water Board staff experience and professional judgement.

Senior/Principal Engineer/Engineering Geologist/Hydrogeologist Range: \$150 - \$240

Staff Geologist/Engineer/Environmental Scientist Range: \$90 - \$180

Other Technician Range: \$80 - \$250

Considering the range of professionals and hourly rates associated with their specialty and experience, and given the terrain and technical nature of the requested technical report, an average hourly rate of \$190 was selected for generating the technical report.

Technical Report

Based on staff experience, completion of report is estimated to take 60-80 hrs.

Hourly rate: \$190

60-80 hrs x \$190 = \$11,400-\$15,200

Fee Schedule Sources

<https://www.mendocinocounty.org/home/showpublisheddocument/41862/637526191532870000>

<http://www.mountaingeology.com/feeSchedule.html>

EXHIBIT D

Central Coast Regional Water Quality Control Board

April 15, 2025

Sable Offshore Corp.
Steven Rusch, Vice President
845 Texas Avenue, Ste 2920
Houston, Texas 77002
Email: SRusch@sableoffshore.com

**VIA CERTIFIED MAIL AND EMAIL
RETURN RECEIPT REQUESTED
9589 0710 5270 0883 4147 17**

Sable Offshore Corp.
Amanda Garcia
Agent for Service of Process
330 N Brand Blvd
Glendale, CA 91203

**VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED
9589 0710 5270 0883 4146 70**

Dear Steven Rusch and Amanda Garcia:

ENFORCEMENT PROGRAM: SABLE OFFSHORE CORP. - NOTICE OF VIOLATION FOR UNAUTHORIZED DISCHARGES OF WASTE TO WATERS OF THE STATE AND UNITED STATES AND FAILURE TO REPORT, SANTA BARBARA AND SAN LUIS OBISPO COUNTIES

The California Regional Water Quality Control Board, Central Coast Region (Central Coast Water Board) is a state regulatory agency with responsibility for protecting the quality of the waters of the state within its area of jurisdiction. The Central Coast Water Board has authority to require submission of information, direct action, establish regulations, levy penalties, and bring legal action when necessary to protect water quality.

The Central Coast Water Board has evidence of a series of unauthorized discharges of waste by Sable Offshore Corp. (Sable) to waters of the state and United States related to Sable's pipeline remediation and planned restart of Line 324 (formerly Line 901) and Line 325 (formerly Line 903). In addition, Sable has not reported all of the information required by the Central Coast Water Board's January 22, 2025 investigative order issued pursuant to California Water Code section 13267. The unauthorized discharges of waste and failure to submit the information required by the investigative order are potential violations of the California Water Code. This notice of violation describes the alleged violations, summarizes potential monetary liability, and provides direction on corrective actions.

Background

In August 2024, Central Coast Water Board staff were made aware by the public of Sable's pipeline remediation work along the Gaviota Coast in Santa Barbara County. When contacted by Central Coast Water Board staff, Sable representative Steve Rusch confirmed his knowledge of the regulatory requirements and confirmed Sable had surveyed all work locations and found no project impacts to waters of the state, which he confirmed to understand includes intermittent and ephemeral streams. In October 2024, the Central Coast Water Board received a complaint from the public of multiple land disturbances across what appeared to be waters of the state on the Gaviota Coast at various Sable pipeline remediation project sites. On November 4, 2024, Central Coast Water Board staff inspected various project work locations along the Gaviota Coast which led to the positive identification of unauthorized discharges to waters of the state.

On December 13, 2024, the Central Coast Water Board issued a notice of violation 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; and that Sable's activities were likely also subject to stormwater permitting. On December 13, 2024, the Central Coast Water Board also issued a California Water Code section 13260 directive to Sable to submit a report of waste discharge for the unauthorized discharges of waste and a Notice of Non-Compliance notifying Sable that it had been identified as requiring a stormwater permit. On January 22, 2025, the Central Coast Water Board issued a second Notice of Non-Compliance for failure to apply for stormwater permitting.

Since the issuance of the December 13, 2024 notice of violation, Sable has continued to commit alleged violations of the California Water Code. For example, while Sable submitted an after-the-fact notice of intent to obtain coverage for work in waters of the state at the location cited in the December 13, 2024 notice of violation, it resumed unauthorized work at the subject site in mid-February prior to obtaining the permit and authorization for the work.

On January 22, 2025, the Central Coast Water Board issued an order, pursuant to California Water Code section 13267, requiring Sable to submit a technical report addressing discharges of waste to waters of the state (13267 Technical Report Order). Among other things, Sable was required to include in the technical report an inventory of all Sable land disturbance activities that were or are currently active in the Central Coast region pertaining to remediation of the Las Flores Pipeline System lines, a detailed assessment of the presence of waters of the state at inventoried land disturbance locations, and a detailed assessment of all waste discharges to waters of the state. While Sable submitted a report in response to the 13267 Technical Report Order on March 8, 2025, its report was deficient, lacking information in response to 13267 Technical Report Order item numbers 2.f and 3.

- a. 13267 Technical Report Order number 2.f required submittal of a detailed assessment of the presence of any of the following in or adjacent to areas disturbed by Sable pipeline remediation activities: wetlands; perennial, intermittent, or ephemeral streams; rivers; lakes; swales; drainages; ditches; or any other depressional features with evidence of bed, bank, or channel. Sable's response refers to the October 5, 2020 Biological Resources Assessment (2nd Revised) prepared by SCS Engineers for Pacific Pipeline Company. This document does not include the required assessment. While the document identifies some waters of the state in the project area, it does not identify all of the waters of the state, nor does it assess the proximity of all waters of the state to areas disturbed by Sable's pipeline remediation activities. For example, the unnamed ephemeral drainage at approximately 34° 28' 6.4" N, 120° 06' 22.5" W, upstream of Hwy 101 at postmile 39, just east of Baron Ranch Trailhead, that was subject to the Central Coast Water Board's December 13, 2024 notice of violation, is not identified in the document.
- b. 13267 Technical Report Order numbers 3.a-c required Sable to identify the locations and sizes of the areas of waters of the state and United States affected by the unauthorized waste discharges; estimate the amount of waste discharged to waters of the state; and assess the biology of areas of the waters of the state impacted by the waste discharges. Sable's response states this information will be submitted late, by April 15, 2025. Sable's response does not provide an explanation for the late submittal.

On February 21, 2025, in response to the December 13, 2024 Notice of Noncompliance, Pacific Pipeline Company submitted an application for construction stormwater general permit (CGP) enrollment for coverage under a facility/site name of Sable Land Base, however the documents submitted as part of this application were incomplete. State Water Resources Control Board staff notified Pacific Pipeline Company that the application was deficient and instructed it to resubmit the application with a complete Stormwater Pollution Prevention Plan on March 12, 2025. Through phone conversation (on February 22, 2025) and via email (on March 18, 2025) with Central Coast Water Board staff, Sable representatives communicated that Sable intends to complete the CGP enrollment only if land disturbance activities outside the existing right-of-way exceed the permit applicability threshold of one acre.

In response to ongoing public complaints, on February 28, 2025, Central Coast Water Board staff made a second site visit to Sable pipeline remediation sites along the Gaviota Coast. Central Coast Water Board staff observed and documented unauthorized discharges of waste at various locations that could affect the quality of waters of the state and United States.

- a. Site 1, Venadito Canyon Road (34.4649° N, -120.052° W) – Riparian vegetation at this location had been cleared and grubbed, with loose bare soil and slash at the site. The loose bare soil and slash at the site are unauthorized discharges of waste that could affect the quality of waters of the state.

- b. Site 7, Arroyo Quemado (34.4734° N, -120.119° W) – An access road had been graded, leaving bare loose soil without erosion and sediment control in several locations. Riparian vegetation at this location had also been cleared and grubbed, with loose bare soil and slash at the site. Freshly cut tree branches and other vegetation, which appeared to have been generated from work conducted by Sable in the riparian area, was observed as dumped waste in the flowing stream. The loose bare soil and slash at the site are unauthorized discharges of waste that could affect the quality of waters of the state and waters of the United States. The cut tree branches and other vegetation into the flowing stream are unauthorized discharges of waste and pollutants to waters of the state and waters of the United States.
- c. Site F7/F8, unnamed drainage (34.4737° N, -120.176° W) – At this location, the bed and banks of an unnamed drainage had been graded, with loose bare soil in the drainage bed. The disturbance of soil on the drainage bed and banks and loose bare soil left in the drainage bed are unauthorized discharges of waste that could affect the quality of waters of the state.
- d. Site F10, unnamed drainage (34.4758° N, -120.196° W) – At this location, a slope had been graded, without erosion and sediment controls. Loose sediment was also discharged into the bank and bed of the unnamed drainage. Riparian vegetation had also been cleared. The loose bare soil and discharge of loose sediment into the drainage at the site are unauthorized discharges of waste that could affect the quality of waters of the state.

On March 12 and 13, 2025, Padre Associates, Inc., on behalf of Sable, submitted a series of after-the-fact notices of intent to obtain authorization for previously conducted unauthorized discharges of waste to waters of the state and waters of the United States and restoration at various locations. Sites R5-1 and R5-3 are within waters of the United States.

- a. R4-1, tributary to Cuyama River (35.059463° N, -119.933144° W)
- b. R5-2, tributary to Peterson Creek (34.627952° N, -120.200412° W)
- c. R5-1, tributary to Nojoqui Creek (34.573883° N, -120.19567° W)
- d. R5-3, tributary to Foxen Canyon (34.80723° N, -120.192° W)

On April 10, 2025, at a California Coastal Commission hearing, Sable confirmed it had placed sand and cement filled bags on the ocean floor below and adjacent to Sable's out-of-service offshore oil and water pipelines.

Alleged Violations

1. Violation of California Water Code Section 13260

California Water Code section 13260 requires any person discharging waste, or proposing to discharge waste, within any region that could affect the quality of waters of the state, to file with the appropriate regional board a report of the discharge. The conditions at Sites 1, 7, F7/F8, F10, R4-1, R5-1, R5-2, and R5-3 represent violations of California Water Code section 13260, because Sable cleared vegetation and excavated and graded sediment at the sites within waters of the state, resulting in discharges of waste that could affect the quality of waters of the state, without having filed reports of waste discharge. Sable's discharge of waste by placing sand and cement filled bags on the ocean floor below and adjacent to Sable's out-of-service offshore oil and water pipelines without having filed a report of waste discharge is also a violation of California Water Code section 13260.

2. Violation of California Water Code Section 13264

California Water Code section 13264 states in part that no person shall initiate any new discharge of waste or make any material changes in any discharge prior to the filing of the report required by California Water Code section 13260. The conditions at the various sites represent violations of California Water Code section 13264, because Sable discharged waste that could affect the quality of waters of the state without obtaining waste discharge requirements from the Central Coast Water Board.

3. Violation of California Water Code Section 13267

California Water Code section 13267 authorizes the regional boards to require that any person who has discharged, discharges, or is suspected of having discharged or discharging, or who proposes to discharge waste within its region shall furnish, under penalty of perjury, technical or monitoring program reports which the regional board requires. Sable was required to submit a technical report to the Central Coast Water Board by March 10, 2025. Sable's submitted technical report did not include the information required by items 2.f and 3.a-c of the Central Coast Water Board's March 10, 2025 13267 Technical Report Order. Sable's failure to include the required information is a violation of California Water Code section 13267.

4. Violation of California Water Code Section 13376

Section 13376 of the California Water Code requires any person discharging pollutants or fill material, or proposing to discharge pollutants fill material, to waters of the United States to file a report of waste discharge. In addition, California Water Code section 13376 prohibits the discharge of pollutants or fill material to waters of the United States except as authorized by waste discharge requirements. Federal Clean Water Action section 301 also prohibits the discharge of pollutants or fill material to waters of the United States without a permit. Sable did not submit a report of waste discharge or obtain waste discharge requirements from the Central Coast Water Board for the discharge of pollutants at Site 7. Sable also did not submit a report of waste discharge or obtain waste discharge requirements from the

Central Coast Water Board prior to discharging fill material to waters of the United States at Sites R5-1 and R5-3. In addition, Sable did not submit a report of waste discharge or obtain waste discharge requirements from the Central Coast Water Board prior to discharging fill material (sand and cement filled bags) to waters of the United States (Pacific Ocean) on the ocean floor below and adjacent to Sable's out-of-service offshore oil and water pipelines. Conducting these activities in waters of the United States without submittal of a report of waste discharge and issuance of waste discharge requirements are violations of California Water Code section 13376 and Clean Water Act section 301.

5. Violations of Prohibitions in Water Quality Control Plan for the Central Coastal Basin (Basin Plan), June 2019 Edition

The Basin Plan prohibits, pursuant to California 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 Units 1 except where discharge is associated with an approved wastewater reclamation program.

Sable may have violated one or both of these Basin Plan prohibitions as a result of its unauthorized work.

Required Corrective Actions

Sable must obtain all required authorizations for corrective restoration and compensatory mitigation activities and submit the missing information from the required technical report. Sable must control all threatened discharges of earthen and organic materials to prevent their discharge to waters of the state and United States. Sable must take action to correct the alleged violations as soon as possible.

To avoid further unauthorized discharges during any restoration and compensatory mitigation implementation in waters of the state or waters of the United States, pursuant to California Water Code sections 13260 and 13376, Sable must apply for and obtain waste discharge requirements from the Central Coast Water Board prior to discharging waste, or proposing to discharge waste, including prior to any material removal, new disturbance, or restoration activity, that could affect the quality of waters of the state or United States.

Potential Enforcement Actions

The alleged violations cited above may subject Sable to enforcement by the Central Coast Water Board for every day the violations continue. Sable must correct the violations as soon as possible. Sable's receipt of this notice of violation does not preclude the Central Coast Water Board from taking further enforcement action for the

alleged violations cited in this notice of violation, and the Central Coast Water Board reserves the right to take any enforcement action authorized by law. In making its determination of whether and how to proceed with further enforcement action regarding the alleged violations in this letter, the Central Coast Water Board will consider the information submitted in response to this notice of violation, the time it takes to correct the identified violations, and the adequacy of the corrections and actions taken.

California Water Code section 13268 provides that failure to submit technical or monitoring program reports required by subdivision (b) of California Water Code section 13267 by the specified compliance date, or falsifying any information provided therein, is a misdemeanor and may result in administrative civil liability of up to \$1,000 for each day of violation. California Water Code section 13385 provides that any person who violates Clean Water Act section 301 and/or California Water Code section 13376, and/or a prohibition issued pursuant to 13243, is subject to administrative civil liability of up to \$10,000 per day of violation, and up to \$10 per gallon of waste discharged but not cleaned up over 1,000 gallons. If the Central Coast Water Board elects to refer the matter to the Attorney General, the superior court may impose civil liability for up to \$25,000 per day for each violation, and up to \$25 per gallon of waste discharged but not cleaned up over 1,000 gallons. California Water Code sections 13261, 13265, and 13350 also provide for per day administrative liabilities or liability per gallon discharged, as specified in the California Water Code.

The Central Coast Water Board may also require cleanup or abatement of the effects of the unauthorized activities pursuant to California Water Code section 13304, that Sable immediately cease and desist from the activities pursuant to California Water Code section 13301, or may require other actions pursuant to other injunctive authorities. The Central Coast Water Board reserves the right to take any enforcement action authorized by law.

If you have questions about this letter, please contact April Woods at April.Woods@waterboards.ca.gov or Phil Hammer at Phillip.Hammer@waterboards.ca.gov.

Sincerely,

 Digitally signed by
Angela Schroeter
Date: 2025.04.15
00:25:40 -07'00'
Water Boards

Angela V. Schroeter
Assistant Executive Officer

cc:

Nicole Granquist, Counsel for Sable, Nicole.Granquist@Stoel.com
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Wesley Horn, California Coastal Commission, Wesley.Horn@coastal.ca.gov
Errin Briggs, Santa Barbara County Planning & Development, EBriggs@countyofsb.org

Jim Hosler, CAL FIRE, Jim.Hosler@fire.ca.gov

Julie Vance, California Department of Fish and Wildlife, Julie.Vance@wildlife.ca.gov

Linda Connolly, California Department of Fish and Wildlife,

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Naomi Rubin, State Water Resources Control Board,

Naomi.Rubin@waterboards.ca.gov

Ryan Lodge, Central Coast Water Board, Ryan.Lodge@waterboards.ca.gov

Angela Schroeter, Central Coast Water Board, Angela.Schroeter@waterboards.ca.gov

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April Woods, Central Coast Water Board, April.Woods@waterboards.ca.gov

Jesse Woodard, Central Coast Water Board, Jesse.Woodard@waterboards.ca.gov

Jacqueline Tkac, Central Coast Water Board, Jacqueline.Tkac@waterboards.ca.gov

R:\RB3\Enforcement\Case Files\Sable Pipeline\NOVs\Second NOV\Sable Offshore
Corp_NOV_4-15-2025.docx

EXHIBIT E

Central Coast Regional Water Quality Control Board

April 16, 2025

Sable Offshore Corp.
Steven Rusch, Vice President
845 Texas Avenue, Ste 2920
Houston, Texas 77002
Email: SRusch@sableoffshore.com

**VIA CERTIFIED MAIL AND EMAIL
RETURN RECEIPT REQUESTED
9589 0710 5270 0883 4146 87**

Sable Offshore Corp.
Amanda Garcia
Agent for Service of Process
330 N Brand Blvd
Glendale, CA 91203

**VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED
9589 0710 5270 0883 4146 25**

Dear Steven Rusch:

**ENFORCEMENT PROGRAM: SABLE OFFSHORE CORP. – DIRECTIVE TO SUBMIT
A REPORT OF WASTE DISCHARGE FOR UNAUTHORIZED DISCHARGES OF
WASTE AND FUTURE PROPOSED DISCHARGES OF WASTE, SANTA BARBARA,
SAN LUIS OBISPO, AND KERN COUNTIES**

This letter contains legal directives that must be followed. Failure to respond may result in fines.

Sable Offshore Corp. (Sable) is receiving this letter because the Central Coast Regional Water Quality Control Board (Central Coast Water Board) has evidence of continued unauthorized discharges of waste to waters of the state at various locations related to Sable's pipeline remediation and planned restart of Line 324 (formerly Line 901) and Line 325 (formerly Line 903). The evidence of unauthorized discharges of waste that could affect the quality of waters of the state is described in the April 15, 2025 notice of violation that the Central Coast Water Board transmitted to Sable.

Discharge of waste that could affect the quality of waters of the state requires submittal of a report of waste discharge and receipt of waste discharge requirements prior to discharge. California Water Code section 13260 requires any person discharging waste, or proposing to discharge waste, within any region that could affect the quality of waters of the state, to file with the appropriate regional board a report of the discharge. California Water Code section 13264 states in part that no person shall initiate any new discharge of waste or make any material changes in any discharge prior to the filing of the report required by California Water Code section 13260.

The Central Coast Water Board requires that Sable submit a report of waste discharge for regulatory coverage for all discharges of waste that could affect the quality of waters of the state associated with its work related to Sable's pipeline remediation and planned restart of Lines 324 and 325. This applies to discharges that have already occurred as well as potential future discharges. To obtain regulatory coverage Sable must submit the appropriate report of waste discharge (e.g., notice of intent) applicable to the category of waste discharge. Central Coast Water Board staff is available to assist Sable in identifying the appropriate reports of waste discharge to submit for its waste discharges.

A report of waste discharge must contain information and data required by the Central Coast Water Board. Dischargers with discharges of dredged or fill material to waters of the state, meeting the eligibility criteria in the *Statewide General Waste Discharge Requirements for Dredge or Fill Discharges to Waters Deemed by the U.S. Army Corps of Engineers to be Outside Federal Jurisdiction (WQO 2004-0004)*,¹ are required to submit a complete report of waste discharge containing the information and data in the Notice of Intent included in Attachment 1 of WQO 2004-0004, or a written report of waste discharge confirming existing regulatory coverage, or a written report of waste discharge demonstrating that regulatory coverage may not be required.

Failure to take these actions may subject Sable to enforcement action by the Central Coast Water Board, including administrative civil liability of up to \$1,000 per day for each day the violation occurs, pursuant to California Water Code section 13261. Administrative civil liability may be imposed by the superior court up to \$5,000 per day for each day the violation occurs, pursuant to California Water Code section 13261. Pursuant to California Water Code section 13265, civil liability may be imposed by the Central Coast Water Board in an amount of up to \$1,000 per day for violation of California Water Code section 13264. Pursuant to California Water Code section 13265, civil liability may be imposed by the superior court in an amount of up to \$5,000 per day for violation of California Water Code section 13264. Regulatory coverage is required regardless of whether civil liabilities are imposed.

Central Coast Water Board staff's recommendations for further enforcement will depend on Sable's response to this letter. The Central Coast Water Board may also require cleanup and abatement of the effects of the unauthorized activities pursuant to California Water Code section 13304, or that Sable immediately cease and desist from the activities pursuant to California Water Code section 13301. The Central Coast Water Board reserves the right to take any enforcement action authorized by law.

Any person aggrieved by this action of the Central Coast Water Board may petition the State Water Resources Control Board to review the action in accordance with California Water Code section 13320 and California Code of Regulations, title 23, sections 2050 and following. The State Water Resources Control Board must receive the petition by

¹ https://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2004/wgo/wgo2004-0004.pdf

5:00pm, 30 days after the date of this directive, except that if the thirtieth day following the date of this Order falls on a Saturday, Sunday, or state holiday (including mandatory furlough days), the petition must be received by the State Water Resources Control Board by 5:00pm on the next business day. Copies of the law and regulations applicable to filing petitions may be found on the Internet at:

https://www.waterboards.ca.gov/public_notices/petitions/water_quality/ or will be provided upon request.

If you have questions about this letter, please contact April Woods at April.Woods@waterboards.ca.gov or Phil Hammer at Phillip.Hammer@waterboards.ca.gov.

Sincerely,

**Angela
Schroeter**



Angela V. Schroeter
Assistant Executive Officer

cc:

Nicole Granquist, Counsel for Sable, Nicole.Granquist@Stoel.com
Stephanie Cook, California Coastal Commission, Stephanie.Cook@coastal.ca.gov
Wesley Horn, California Coastal Commission, Wesley.Horn@coastal.ca.gov
Errin Briggs, Santa Barbara County Planning & Development, EBriggs@countyofsb.org
Jim Hosler, CAL FIRE, Jim.Hosler@fire.ca.gov
Julie Vance, California Department of Fish and Wildlife, Julie.Vance@wildlife.ca.gov
Linda Connolly, California Department of Fish and Wildlife, Linda.Connolly@wildlife.ca.gov
Naomi Rubin, State Water Resources Control Board, Naomi.Rubin@waterboards.ca.gov
Ryan Lodge, Central Coast Water Board, Ryan.Lodge@waterboards.ca.gov
Angela Schroeter, Central Coast Water Board, Angela.Schroeter@waterboards.ca.gov
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Phil Hammer, Central Coast Water Board, Phillip.Hammer@waterboards.ca.gov
Tamara Anderson, Central Coast Water Board, Tamara.Anderson@waterboards.ca.gov
Leah Lemoine, Central Coast Water Board, Leah.Lemoine@Waterboards.ca.gov
April Woods, Central Coast Water Board, April.Woods@waterboards.ca.gov
Jesse Woodard, Central Coast Water Board, Jesse.Woodard@waterboards.ca.gov
Jacqueline Tkac, Central Coast Water Board, Jacqueline.Tkac@waterboards.ca.gov

EXHIBIT F

Central Coast Regional Water Quality Control Board

July 24, 2025

Sable Offshore Corp
Steven Rusch, Vice President
845 Texas Avenue, Ste 2920
Houston, Texas 77002
Email: SRusch@sableoffshore.com

**VIA CERTIFIED MAIL AND EMAIL
RETURN RECEIPT REQUESTED
9589 0710 5270 0883 4161 62**

Sable Offshore Corp
Amanda Garcia
Agent for Service of Process
330 N. Brand Blvd.
Glendale, CA 91203

**VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED
9589 0710 5270 0883 4161 79**

Dear Steven Rusch:

ENFORCEMENT PROGRAM: SABLE OFFSHORE CORP - NOTICE OF VIOLATION FOR FAILURE TO REPORT, SANTA BARBARA AND SAN LUIS OBISPO COUNTY

The California Regional Water Quality Control Board, Central Coast Region (Central Coast Water Board) is a state regulatory agency with responsibility for protecting the quality of the waters of the state within its area of jurisdiction. The Central Coast Water Board has authority to require submission of information, direct action, establish regulations, levy penalties, and bring legal action when necessary to protect water quality.

We are in receipt of Sable Offshore Corp's (Sable) March 7, 2025 and April 15, 2025 submittals responding to the Central Coast Water Board's January 22, 2025 directive to submit a technical report (directive), issued pursuant to California Water Code section 13267. Sable's submittals do not include all the information required by the Central Coast Water Board's January 22, 2025 directive. Failures to report all required information are violations of the California Water Code. This notice of violation describes the alleged violations, summarizes potential monetary liability, and provides direction on corrective actions. This is the second notice of violation the Central Coast Water Board has issued to Sable for failure to submit the information required in the January 22, 2025 directive. The Central Coast Water Board previously issued Sable a notice of violation for failure to submit the January 22, 2025 directive's required information on April 15, 2025. The violations of California Water Code section 13267 cited in the April 15, 2025 notice of violation have not been adequately addressed by Sable and those violations remain uncorrected and in effect.

Alleged Violations

1. Violations of California Water Code Section 13267

California Water Code section 13267 authorizes the regional boards to require that any person who has discharged, discharges, or is suspected of having discharged or discharging, or who proposes to discharge waste within its region shall furnish, under penalty of perjury, technical or monitoring program reports which the regional board requires. Sable was required to submit a technical report to the Central Coast Water Board by March 10, 2025. Sable's March 7, 2025 and April 15, 2025 submittals do not include all the information required by the Central Coast Water Board in its January 22, 2025 directive. Sable's failures to include the required information are violations of California Water Code section 13267. Information required by the Central Coast Water Board's January 22, 2025 directive that has not been provided by Sable includes the following:

- A. Item 2.f of the directive requires Sable to submit *"For each land disturbance activity, a detailed assessment of the presence of any of the following in or adjacent to the disturbed area: wetlands; perennial, intermittent, or ephemeral streams; rivers; lakes; swales; drainages; ditches; or any other depressional features with evidence of bed, bank, or channel."* Sable's response solely refers to the October 5, 2020 Biological Resources Assessment (2nd Revised) prepared for Pacific Pipeline Company and SCS Engineers (2020 Biological Resources Assessment). This document is a regional assessment of major watersheds along the length of the pipeline and is therefore overly broad and not specific to the actual land disturbance activities conducted by Sable in the field. The document does not include assessments of the presence of all waters relative to all land disturbance activity locations identified by Sable in response to directive item 2.a; nor does the document include adequate information in order to perform such assessments. Numerous land disturbance activity locations identified by Sable in its response to directive item 2.a appear to potentially be located within or adjacent to waters of the types listed in directive item 2.f, based on coordinates provided by Sable. However, many of those waters are not identified nor discussed in the 2020 Biological Resources Assessment. Since these waters are not mentioned in the 2020 Biological Resources Assessment, the 2020 Biological Resources Assessment does not satisfy the January 22, 2025 directive requirement to provide a detailed assessment of the presence of waters in or adjacent to all land disturbance activity locations. Examples of land disturbance activity locations potentially within or adjacent to waters, for which the 2020 Biological Resources Assessment provides no information on the presence of waters, include:

Sable ID	Latitude	Longitude
0324-2022-0023785.27	34.462931	-120.094125
0324-2022-0023727.57	34.462885	-120.094002

0324-2022-0029534.66	34.469233	-120.110945
0324-2022-0029566.37	34.469275	-120.111038
0324-2022-0033655	34.47309	-120.123312
324-MOV7	34.473112	-120.12373
0324-2022-0044111.96	34.474257	-120.156051
0324-2022-0044125.32	34.474248	-120.156093
0324-2022-0044140.39	34.474239	-120.15614
0324-2022-0044891.b	34.47377	-120.158562
0324-2022-0044830.73	34.473801	-120.158366
0324-2022-0044951.35	34.47377	-120.158662
0324-2022-0046848.73	34.472896	-120.164729
0324-2022-0046966.28	34.47287	-120.165099
0324-2022-0047470.3	34.472916	-120.166717
325A-2022-0049874.76	34.541078	-120.203609
325A-2022-0060280.35	34.562141	-120.194331
325A-2022-0112641.30	34.683775	-120.189346
325A-CHK17	34.689468	-120.187514
325A-2023-0117800.29	34.696125	-120.182573
325A-2022-0176208.70	34.833362	-120.221401
325A-2023-0179864.97	34.841481	-120.222209
325A-2022-0185869.01	34.880235	-120.249693
325A-2023-0187372.96	34.883063	-120.253233
Site 5/6	35.096451	-120.051266
Site 6/7	35.043303	-119.893327
325B-MOV39	35.007636	-119.423418

- B. Item 3.a of the directive requires Sable to submit *“A detailed assessment of waste discharge to surface waters resulting from Sable’s Las Flores Pipeline System line remediation work activities, including: a. An identification of the locations and sizes of the areas of waters of the state and waters of the U.S. affected by the unauthorized waste discharges. (1) Quantify areas of disturbance in units of acres and linear feet. (2) Quantify discharges to waters of the state in cubic yards.”* Sable’s response only identifies and assesses four locations of waste discharge to surface waters and for those locations Sable failed to quantify discharges to waters of the state in cubic yards. Instead, Sable attempted to quantify the net discharge of material to the drainage after Sable completed work at the locations – this is not the information Sable was directed to submit. In addition, Central Coast Water Board staff has identified other locations of waste discharge to surface waters that were not included in Sable’s response, including but not limited to, Site ID 7 (Arroyo Quemada at 34.4734, -120.119) and Site ID F10 (Canada Del Leon at 34.4758, -120.196).
- C. Item 3.b of the directive requires Sable to submit *“A detailed assessment of waste discharge to surface waters resulting from Sable’s Las Flores Pipeline System line remediation work activities, including: [...] b. An estimate of the amount of waste discharged, in gallons or cubic yards as applicable, to waters of the state resulting from Sable’s Las Flores Pipeline System line remediation activities, including an estimate of the amount of sediment remaining in sediment stockpile areas and ephemeral drainages that have the potential to be discharged to downstream reaches.”* As discussed above, Sable’s response only identifies and assesses four locations of waste discharge to surface waters and for those locations Sable failed to quantify discharges to waters of the state in cubic yards. Instead, Sable attempted to quantify the net discharge of material to the drainage after Sable completed work at the locations – this is not the information Sable was directed to submit. In addition, Central Coast Water Board staff has identified other locations of waste discharge to surface waters that were not included in Sable’s response, including but not limited to, Site ID 7 (Arroyo Quemada at 34.4734, -120.119) and Site ID F10 (Canada Del Leon at 34.4758, -120.196).
- D. Item 3.c of the directive requires Sable to submit *“A detailed assessment of waste discharge to surface waters resulting from Sable’s Las Flores Pipeline System line remediation work activities, including: [...] c. A biological assessment of the areas of the waters of the state impacted by the waste discharges resulting from Sables’s pipeline remediation activities, including a description of impacted riparian and aquatic habitats and an assessment of their quality.”* As discussed above, Sable’s response only identifies and assesses four locations of waste discharge to surface waters despite the fact that Central Coast Water Board staff has identified other locations of waste discharge to surface waters that were not included in Sable’s response, including but not limited to, Site ID 7 (Arroyo Quemada at 34.4734, -120.119) and Site ID F10 (Canada Del Leon at 34.4758, -120.196). Sable’s response also does not identify or assess impacts to riparian habitats, such as those at Site ID 7 (Arroyo Quemada at 34.4734, -120.119) and Site ID F10 (Canada Del Leon at 34.4758, -120.196).

- E. Item 4 of the directive requires Sable to submit “*A detailed description of actions Sable can take to mitigate impacts to water quality and beneficial uses of waters of the state caused by the discharge of waste resulting from Sable’s pipeline remediation activities, including onsite restoration and offsite compensatory mitigation options.*” Sable’s response refers to a restoration plan for one work location. Sable’s response is inadequate, since a single restoration plan does not address the different conditions that exist at the numerous work locations.
- F. It is worth noting that while Sable provided a checklist to address directive item 5, Sable has not been using it.

Required Corrective Actions

Sable must take action to correct the alleged violations as soon as possible. To correct the alleged violations, Sable must submit the missing information. Note that while the Central Coast Water Board has identified above examples of deficiencies in your response, the deficiencies cited are not exhaustive. Sable bears the responsibility to complete a full assessment of its work sites and fully comply with the January 22, 2025 directive. To date, this has not happened.

Potential Enforcement Actions


The alleged violations cited above may subject Sable to enforcement by the Central Coast Water Board for every day the violations continue. Sable’s receipt of this notice of violation does not preclude the Central Coast Water Board from taking further enforcement action for the alleged violations cited in this notice of violation, and the Central Coast Water Board reserves the right to take any enforcement action authorized by law. In making its determination of whether and how to proceed with further enforcement action, the Central Coast Water Board will consider the information submitted in response to this notice of violation, the time it takes to correct the identified violations, and the adequacy of the corrections and actions taken.

California Water Code section 13268 provides that failure to submit technical or monitoring program reports required by subdivision (b) of California Water Code section 13267 by the specified compliance date, or falsifying any information provided therein, is a misdemeanor and may result in administrative civil liability of up to \$1,000 for each day of violation.

If you have questions about this letter, please contact April Woods at April.Woods@waterboards.ca.gov or Phil Hammer at Phillip.Hammer@waterboards.ca.gov.

Sincerely,

Angela
Schroeter

 Digitally signed by Angela
Schroeter
Date: 2025.07.24 12:41:09
Water 1:07:00

Angela V. Schroeter
Assistant Executive Officer

cc:

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Ryan Lodge, Central Coast Water Board, Ryan.Lodge@waterboards.ca.gov