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SIERRA CLUB
SANTA LUCIA



THE OTTER PROJECT

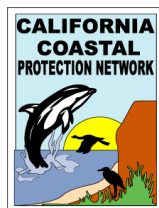
NAACP
San Luis Obispo County Branch



Clean Coalition



scientist rebellion_



extinction rebellion
SF BAY AREA



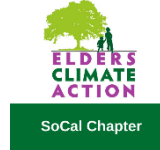
SANTA BARBARA
STANDING ROCK
COALITION

VOTING 4
CLIMATE
& HEALTH



NorCal Chapter





December 12, 2024

The Honorable Gavin Newsom
Governor of California
1021 O Street, Suite 9000
Sacramento, CA 95814

RE: Protecting California from the proposed restart of dangerous oil operations on the Santa Barbara coast

Dear Governor Newsom,

We, the undersigned organizations, are grateful for your efforts to hold the oil industry accountable and protect Californians from oil industry pollution. Your bold leadership gives hope to communities burdened by pollution and affected by the climate crisis. California action to phase out oil production is all the more important now given the threats of more offshore oil drilling and climate inaction under a second Trump administration.

We are writing today regarding the shocking, potentially imminent restart of the pipeline that caused the 2015 Plains Pipeline oil spill. Restarting this dangerous pipeline would allow renewed operation of the largest offshore oil operation in the Santa Barbara Channel and its onshore production facilities, which have been shut down for nearly ten years.

One of the most disastrous oil spills in California history, the Plains Pipeline rupture spilled hundreds of thousands of gallons of oil into one of the richest and most biologically diverse stretches of the Pacific coastline, killing hundreds of animals and closing beaches and fisheries. Restarting the pipeline and allowing the operation of the offshore platforms, subsea pipelines, and onshore production facilities poses an unacceptable risk to the California coast.

We ask that you ensure that all state agencies with jurisdiction over this project fully comply with environmental laws, prioritize protecting our environment, and deny permission to restart the unsafe pipeline.

We are particularly concerned that CAL FIRE may approve the restart of the pipeline without any environmental review and by waiving federal and state pipeline safety requirements. Federal regulators determined that corrosion, and the lack of effective cathodic protection against corrosion, caused the spill. In 2023, Pacific Pipeline Company, a subsidiary of ExxonMobil, scrapped plans to build a new pipeline. Now, a newly formed company, Sable Offshore Corp., intends to restart the ruptured pipeline and has requested a *waiver* of cathodic protection safety measures, which is currently pending before CAL FIRE.

Earlier this year, Sable Offshore Corp. purchased the pipeline system, three offshore platforms (Hondo, Heritage, and Harmony), and the Las Flores Canyon and POPCO processing facilities. Sable borrowed most of the purchase cost from the former owner, ExxonMobil, and raised additional funds through a merger with a blank check company, Flame Acquisition Corp. From 2017-2021, Sable Offshore Corp. CEO James Flores served as the CEO for oil company Sable Permian, which filed for bankruptcy in 2020. Sable Offshore Corp. is currently subject to a Cease and Desist Order from the Coastal Commission for recent illegal work in the Coastal Zone. There

are many questions about the company's ability to comply with its permit and clean-up obligations. Nevertheless, Sable has announced plans to restart the operations, most recently with an end of 2024 target date.

The risks to California from this proposal are severe and unacceptable:

- **The aging offshore platforms and pipelines are beyond their projected lifespan of 35 and 30 years, respectively,** and inspections have documented problems of infrastructure corrosion and leaks.
- **Restarting the pipeline could result in a spill once a year and a rupture every four years** according to an administrative draft environmental report prepared for Santa Barbara County.
- **An oil spill threatens sensitive and unique ecosystems.** The pipelines traverse the coastline and three counties, and cross rivers and streams, state parks, national forests, wildlife refuges, and the Carrizo Plain National Monument. An offshore spill would affect the newly designated Chumash Heritage National Marine Sanctuary.
- **Offshore well stimulation, now banned in California, may result from restart** because the former owner, ExxonMobil, represented that it needed to use offshore acid well stimulation, which poses more pollution risks.
- **The Las Flores Canyon onshore oil facilities are in a high fire area.** Since closure, two fires have burned onto the property—the Sherpa Fire in 2016 and the Alisal Fire in 2021—and the Refugio Fire in 2024 threatened the facility.
- **This project would be Santa Barbara's largest source of greenhouse gas pollution.** According to the Air Resources Board, before it shut down in 2015, it was the County's largest stationary source of greenhouse gas emissions, as well as many other air pollutants that cause cancer, asthma, and other health issues.
- **Offshore oil is inherently risky and unpopular,** with 72% of Californians and 90 coastal municipalities opposing it. The Business Alliance for Protecting the Pacific Coast, which represents over 8,100 businesses, warns that spills put our coastal economy at risk.
- **Sable Offshore defied state law and enforcement.** On September 27, 2024, the California Coastal Commission issued a Notice of Violation to Sable for unauthorized and unlawful development activities in the coastal zone. Sable received a second warning on October 4. On November 12, the Coastal Commission issued Cease and Desist Order No. ED-24-CD-02 for continuing violations of the Coastal Act.

The State of California should not let such a risky oil operation move forward.

We urge your oversight to ensure that all state agencies comply with applicable law and act in the public interest. CAL FIRE should deny the request for a waiver of pipeline safety standards. To the degree CAL FIRE continues to consider the request, CAL FIRE must not move forward absent full environmental review that evaluates the proposed pipeline restart, a waiver from cathodic protections against corrosion, and new oil and gas activities both offshore and onshore.

More than a dozen California State Senators and Assemblymembers expressed significant concerns about the restart of the pipeline system and the need for an environmental review under the California Environmental Quality Act (CEQA). We agree, and believe that any meaningful environmental review will reveal that this dangerous project should be denied.

This oil and gas operation was shut down over nine years ago without causing energy interruptions, demand is projected to continue to decline, and the community has benefited from cleaner air and water. Instead of allowing this risky oil operation to restart, the state should continue to decrease demand for fossil fuels and advance its clean energy goals.

Thank you for your consideration of our request.

Sincerely,

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