

 <p>air pollution control district SANTA BARBARA COUNTY</p>	Case No / Date	2025-17-E	09/03/2025
	Petitioner	Sable Offshore Corp.	
	Permit #	Part 70/PTO 9101-R7	
	Date Rec'd	08/28/2025	
	Time Rec'd	0901 hours	
	FOR OFFICIAL USE ONLY		

**BEFORE THE HEARING BOARD
OF THE SANTA BARBARA COUNTY
AIR POLLUTION CONTROL DISTRICT**

In the Matter of the Application of)
Sable Offshore Corp. for an)
Emergency Variance from District)
Rule, 206, Part 70/Permit to)
Operate 9101-R7, Conditions 9.A.18,)
9.C.1.e., 9.C.2.e., 9.C.3.e., 9.C.4.e.,)
9.C.5.e., 9.C.6.e., 9.C.7.e., 9.C.8.e.,)
and 9.C.10)

H.B. Case No. 2025-17-E

VARIANCE FINDINGS

AND ORDER

Sable Offshore Corp. (Petitioner) filed a Petition for an Emergency Variance on August 28, 2025. A hearing of the Emergency Variance Petition was held on September 3, 2025. Patrice Surmeier represented the Petitioner, Eric Kett represented the Santa Barbara County Air Pollution Control District (District), and Terence Dressler represented the Hearing Board for this Emergency Variance Hearing.

This matter having been fully presented and duly considered, the Hearing Board makes the following findings and gives the following reasons for its decision.

HEARING

1. Notice of the Hearing was duly given in the manner and for the time required by law.
2. Sworn testimony and argument on behalf of the Petitioner and the Air Pollution Control Officer were made, received, and considered.
3. A nuisance as defined in District Rule 303 is not expected to occur as a result of this Variance.
4. Pursuant to Health and Safety Code section 42359.5, "good cause" exists for the granting of the Petitioner's request for an Emergency Variance.
5. If, due to reasons beyond the control of the Petitioner, compliance is not achieved during this

Variance period, additional relief will be sought.

6. District staff supports the Petition as conditioned below.

BACKGROUND

1. The Petitioner operates the equipment described in the Petition at Sable Offshore Corp.'s (Sable) Platform Harmony located on lease tract OCS P-0190 approximately 25 miles west of the City of Santa Barbara, California.
2. The Petitioner's main operating permit, PT 70/PTO 9101-R7, authorizes the operation of equipment and processes located at Platform Harmony, which is part of the Sable Santa Ynez Unit (SYU) Project. The SYU Project develops production from three platforms (Platforms Hondo, Harmony and Heritage) located offshore in the Santa Barbara Channel.
3. Platform Harmony is an eight leg, 60 well slot platform that produces sour natural gas and crude oil. Emulsion and produced gas are shipped via sub-sea pipelines to the Petitioner's Las Flores Canyon Facility (LFC). Produced gas from Platform Harmony is shipped via pipeline to Platform Hondo and then to the Petitioner's Pacific Offshore Pipeline Company (POPCO) Gas Plant.
4. The Petitioner's permit requires a semi-annual compliance verification report (CVR) to be submitted to the District by March 1st and September 1st each year. Each report is required to document compliance with all permit, rule or other statutory requirements during the prior two calendar quarters.
5. According to the Petitioner, the CVR preparation has been underway for more than one month with the intention of meeting the September 1, 2025 deadline. However, the main preparer and reviewer of the data became ill and could not work starting August 26, 2025 and has now tested positive for COVID-19.
6. Because the preparation of the CVR is specialized and requires detailed understanding of the permit requirements and data, transferring the duties to alternative personnel is not feasible.
7. The Petitioner requested an extension from the District, however, there is not a mechanism for the District to grant a CVR extension.
8. As a result, the Petitioner will not meet the September 1, 2025 deadline and has sought variance coverage.
9. No excess emissions are expected with the granting of this Variance request.

FINDINGS

1. Without Variance coverage, the Petitioner will be in violation of District Rule, 206, Part 70/Permit to Operate 9101-R7, Conditions 9.A.18, 9.C.1.e., 9.C.2.e., 9.C.3.e., 9.C.4.e., 9.C.5.e., 9.C.6.e., 9.C.7.e., 9.C.8.e., and 9.C.10.
2. Pursuant to Health and Safety Code section 42359.5, “good cause” exists for the granting of Petitioner’s request for an Emergency Variance.

THEREFORE, THE HEARING BOARD ORDERS, as follows:

That an Emergency Variance be granted for submitting the CVR beyond the specified deadline, which is in violation of District Rule, 206, Part 70/Permit to Operate 9101-R7, Conditions 9.A.18, 9.C.1.e., 9.C.2.e., 9.C.3.e., 9.C.4.e., 9.C.5.e., 9.C.6.e., 9.C.7.e., 9.C.8.e., and 9.C.10. from September 1, 2025 through September 15, 2025, or the date compliance is achieved, whichever occurs first, with the following conditions:

1. Petitioner shall submit the CVR no later than September 15, 2025.
2. Petitioner shall submit a written report to the Hearing Board and District, to variance@sbcapcd.org, by September 30, 2025. The report shall include the date compliance was achieved.
3. Petitioner shall retain the obligation to comply with all other local, state, and federal regulations not specifically referenced in the Order.
4. Failure to abide by all conditions of this Order shall subject the Petitioner receiving the variance to penalties set forth in Health and Safety Code section 42402.
5. In accordance with District Fees Rule 210, the Petitioner shall pay excess emission fees for each additional ton of pollutant emissions, or portion thereof, allowed as the result of the issuance of this Variance.
6. The Environmental Protection Agency does not recognize California’s Variance Program; therefore, this Variance does not protect the Petitioner from Federal Enforcement actions.
7. Each day during any portion of which a violation occurs is a separate offense.

DATED: 09/02/25

Terence E. Dressler

Terence E. Dressler (Sep 3, 2025 16:04:33 PDT)

Terence Dressler
Santa Barbara County Air Pollution Control District
Hearing Board