



H.B. Case No.:	<u>2026-07-N</u>
Petitioner:	<u>Sable Offshore Corp.</u>
Permit No.:	<u>PT 70/PTO 9102-R7</u>
Date Rec'd:	<u>05/22/2026</u>
Time Rec'd:	<u>1614 hours</u>
Filing Fee Paid:	<u>\$977.00</u>

PETITION FOR VARIANCE

Type of Variance Requested:

Emergency _____ Interim¹ X 90-Day X Regular _____

Length of Variance Requested: Start Date May 22, 2026

End Date August 20, 2026

¹ A 90-Day or Regular Variance must be filed concurrently with an Interim Variance

1. PETITIONER INFORMATION

A. Please provide the name, address and phone number of the Petitioner.

Name: Sable Offshore Corp.

Address: 12000 Calle Real
Goleta, CA

Phone Number: (805) 450-6573

B. Please provide the name, address and phone number of the person authorized to receive correspondence regarding this Petition if different from response in 1.A.

Name: Patrice Surmeier

Address: 12000 Calle Real
Goleta, CA 93117

Phone Number: (805) 567-9503

C. The Petitioner is (please check one):

- 1) An Individual ()
- 2) Partnership ()
- 3) Corporation (X)
- 4) Public Agency ()
- 5) Other Entity (please describe)

2. Location of equipment for which the variance is requested if different from response in 1.A.

**Platform Heritage, Parcel OCS P-0182, Outer Continental Shelf
FID: 8019, SSID: 01482**

3. List any District permits that are applicable to the equipment subject to this variance request.

PT-70/Reeval 9101-R7

4. Briefly describe the equipment that is the subject of this Petition.

Flare Relief System - Unplanned (Device ID: 102385)

5. **FINDINGS REQUIRED FOR THE GRANTING OF A VARIANCE**

In order for the Hearing Board to grant a variance to a Petitioner authorizing the operation of a source in violation of any rule, regulation or order of the District, the Hearing Board is required to make “findings” in accordance with the requirements specified in California Health and Safety Code §42352, et. seq. and District rules and regulations. The Hearing Board’s variance decision will take into consideration information you provide in this Petition. Please ensure your responses are complete and thorough. Please use additional pages as necessary.

A. Please state 1) what District rule, regulation or order you either are or will be in violation of, and 2) the date said violation will or did occur. Include as appropriate the applicable permit conditions for which variance relief is being sought.

- 1. **PT-70/Reeval 9102-R7, Condition 9.C.3(a) - Emission Limits**
- 2. **PT-70/Reeval 9102-R7, Condition 9.C.3(b)(i) - Flaring Volumes**
- 3. **PT-70/Reeval 9102-R7, Condition 9.C.18 – Mass Emission Limitations (Unplanned Flaring Only)**

Quarterly unplanned flaring volume and emission limits were exceeded on May 22, 2026.

B. Please describe how compliance with the District rule, regulation or order listed in Section A above is beyond your reasonable control. In addition to any other relevant factors, please include in your discussion 1) what actions you have taken to comply or seek a variance, which were timely and reasonable under the circumstances.

As a prudent operator, Sable performed extensive recommissioning work preceding the Platform Heritage restart operations. This involved system inspections, testing the operation of all devices and mechanical equipment, and maintenance of equipment in all areas of the platform. Additionally, Sable conducted well surveys to evaluate well status and conditions. Restart operations began on 3/23/26 with the dynamic commissioning of the equipment and on 3/31/26 well production began. The platform has experienced an unexpected number of equipment malfunctions, onshore and offshore production balancing issues, and well production issues which are related to restart of the platform, and which have resulted in excess unplanned flaring. Unforeseen issues with the

reestablishment of sweet gas well production has also caused unexpected flaring related to attempts to stimulate gas flow.

Additionally, the platform is currently reinjecting all disassociated produced gas as gas cannot be sent to shore via the gas pipeline at this time. Produced gas that cannot be injected must be flared until the gas line to shore is reestablished.

- C. Please describe how you would be impacted if you were required to immediately comply with the District rule, regulation or order the subject of this variance request. In addition to any other relevant factors, please discuss why such impacts would result in 1) an arbitrary or unreasonable taking of property, or 2) the practical closing and elimination of a lawful business.

If immediate compliance were required, the facility would be required to completely shut in and depressurize the system. Immediate compliance would result in delayed production and lost revenues of approximately \$1.75 million per day.

- D. If you were required to immediately comply with the District rule, regulation or order the subject of this variance request, please describe what impact, if any that would have on air contaminants.

Immediate compliance with APCD rules and permit conditions would require Platform Heritage to completely shut down, depressurize equipment and isolate the wells. This would result in substantial flaring emissions from the depressurization of each vessel and shutdown the system.

- E. Please describe what consideration you have given to curtailing of operations in lieu of obtaining a variance.

Curtailment of production has not been considered as it would not necessarily reduce the volume of flaring. Also, curtailment of the flare is not being considered because the flare is necessary to comply with various regulatory requirements to not vent non-combusted produced gas to the atmosphere and the associated risk it would pose to workers, the public and environment.

- F. Please describe what steps and measures you will take to reduce excess pollutant emissions the maximum extent feasible during the requested variance period.

Sable continues to work through the complexity of the restart with attention to reducing flaring to the extent possible. It is expected that this excess flaring is temporary in nature and once upsets related to the restart are resolved, flaring will be below the permitted limit.

Additionally, Sable is working towards restarting the gas line that delivers produced gas to shore by shortly which will provide another mechanism for reducing flaring.

- G. If requested to do so by the District, please describe how you will monitor or otherwise quantify and report to the District any pollutant emissions associated with the granting of your variance.

Emissions associated with the granting of this variance would be calculated based on the measured volume of gas routed to the flare per the calibrated flowmeters and multiplied by the appropriate emission factors listed in PT-70/Reeval 9102-R7, Table 5.2.

6. SUPPLEMENTAL FINDINGS IF APPLYING FOR AN EMERGENCY VARIANCE PURSUANT TO RULE 506 (EMERGENCY VARIANCE FOR BREAKDOWNS)

- A. Please provide the date and time the breakdown was reported to the District

Date: N/A Time: N/A

B. Breakdown number (as provided by the District):

N/A

C. Please provide a description of the "breakdown condition", including equipment involved and the cause to the extent it is known.

N/A

D. Please describe why the continued operation of your facility in a "breakdown condition" is not likely to cause an immediate threat or hazard to public health or safety and will not interfere with the attainment or maintenance of any primary national ambient air quality standard.

N/A

7. Will the operation of the equipment subject to this variance result in violation of District Rule 303, Nuisance?

The granting of this variance is not expected to result in injury, detriment, nuisance, or annoyance to the public, and will not endanger the health or safety of the public or cause injury or damage to business or property.

8. Please state whether or not any civil or criminal case involving the equipment subject to this variance is pending any court.

No case involving the same or identical equipment is pending in any court, civil or criminal, for which Sable is aware.

The undersigned is authorized to submit the above Petition on behalf of the Petitioner and further states under penalty of perjury under the laws of the State of California, that the above Petition, including any attachments and the items therein set forth, are true and correct.

DATE: May 22, 2026

SIGNATURE:

Signed by:

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TITLE:

Sr. VP Operations

PRINT NAME:

Trent Fontenot

Variance Filing Fees: All variance Petitions must be accompanied by the requisite filing fee at the time of filing or include a letter from the Petitioner on company letterhead authorizing the District to debit the filing fee from the company's reimbursable account. You may also pay your filing fees by credit card using the attached form. Current variance filing fees may be found under Rule 210, schedule F, Sections 12a and 12b at <http://www.sbcapcd.org/fees.htm>

Credit Card Payment: The Variance Filing Fee may be paid with a credit card. Please use APCD Form -01C to pay via credit card. The form may be downloaded at: <http://www.sbcapcd.org/eng/dl/dl01.htm>