

From: [BILL WOODBRIDGE](#)
To: [CSLC CommissionMeetings](#)
Subject: June 7 meeting, agenda Item 70 - Exxon lease transfer to Sable.
Date: Wednesday, June 5, 2024 7:39:02 PM

Attention: This email originated from outside of SLC and should be treated with extra caution.

Dear Commissioners:

I live in Santa Barbara. Please do NOT allow this transfer of ownership from Exxon to Sable. Sable has no money with which to repair or manage infrastructure or clean up any spills or leaks. They will just declare bankruptcy and leave tax payers with the bills.

- Sable is a startup oil company with loans from Exxon and money raised from a speculative blank check company. It has no experience with offshore oil.
- Sable is run by an oil speculator who has a history of failed companies and bankruptcies.
- Sable's [reported assets](#) are net negative with over seven hundred million in debt: *"Ended the quarter with outstanding debt of \$771.2 million, inclusive of paid-in-kind interest, and cash balance of \$209.1 million."*
- Santa Barbara County Energy Division lacks confidence in their financing too: ***"Exxon loaned Sable more than 60 percent of the funds needed for the purchase of the unit, "making finances a concern,"***
- The Southern California Coastline with the largest population and GDP of any state is the worst possible place to take a risk with a financially risky, speculative oil company run by someone with a history of bankruptcies.
- The Gulf oil spill has cost BP \$71 billion dollars so far. A similar spill here would be even more devastating and expensive.
- The platforms are well past their projected lifespan, and Sable proposes 100 drills with dubious new techniques that would likely involve fracking and other well stimulation techniques with high risk of ocean contamination. The onshore pipeline is corroded and was considered unusable by Exxon. The onshore facilities were one of the largest sources of pollution in Santa Barbara County and almost burned down during recent fires. There is a much greater than average risk of this operation.

Thank you,

Bill Woodbridge

From: [Rachel Altman](#)
To: [CSLC CommissionMeetings](#)
Subject: June 7 meeting, agenda Item 70 - Exxon lease transfer to Sable.
Date: Thursday, June 6, 2024 10:15:20 AM

Attention: This email originated from outside of SLC and should be treated with extra caution.

Dear Commissioners,

It is essential that you do not approve the transfer of ownership from Exxon to Sable for the following reasons:

Sable is a startup oil company using loans from Exxon and money raised from a speculative blank check company. It has no experience with offshore oil.

Sable is run by an oil speculator who has a history of failed companies and bankruptcies. Per [the Independent](#), **"Sable CEO James C. Flores hasn't had the best luck with his previous oil endeavors. He served as the chief executive for PXP (Plains Exploration & Production Co.) in the early 2000s...Arizona-based Freeport-McMoRan eventually bought out PXP in 2013 and retained Flores as a CEO. He departed the company in 2016 when Freeport amassed huge amounts of debt under his leadership, a company news release stated. From there, Flores headed Sable Permian Resources, which, according to its Chapter 11 filings, went bankrupt in a hasty three years when oil prices shot down."**

Sable's [reported assets](#) are net negative with over seven hundred million in debt: "...ended the quarter with outstanding debt of \$771.2 million, inclusive of paid-in-kind interest, and cash balance of \$209.1 million."

Santa Barbara County Energy Division lacks confidence in their financing too: **"Exxon loaned Sable more than 60 percent of the funds needed for the purchase of the unit, 'making finances a concern,'" said Briggs.**

The Southern California Coastline with the largest population and GDP of any state is the worst possible place to take a risk with a financially risky, speculative oil company run by someone with a history of bankruptcies.

The Gulf oil spill has cost BP \$71 billion dollars so far. A similar spill here would be even more devastating and expensive.

The platforms are well past their projected lifespan, and Sable proposes 100 drills with dubious new techniques that would likely involve fracking and other well stimulation techniques with high risk of ocean contamination. The onshore pipeline is corroded and was considered unusable by Exxon. The onshore facilities were one of the largest sources of pollution in Santa Barbara County and almost burned down during recent fires. There is a much greater than average risk of this operation.

Thank you for your attention to this important matter.

Rachel (Rochelle) Altman

[REDACTED]

Santa Barbara, CA [REDACTED]


From: [Sharon Broberg](#)
To: [CSLC CommissionMeetings](#)
Subject: June 7 meeting, agenda Item 70 - Exxon lease transfer to Sable.
Date: Thursday, June 6, 2024 12:39:53 PM

Attention: This email originated from outside of SLC and should be treated with extra caution.

Please deny the transfer of the Exxon lease to Sable.

Sable is a startup oil company with loans from Exxon and money raised from a speculative blank check company. It has no experience with offshore oil.

The Southern California Coastline with the largest population and GDP of any state is the worst possible place to take a risk with a financially risky, speculative oil company run by someone with a history of bankruptcies.

Sharon Broberg
Santa Barbara


From: [Irene Cooke](#)
To: [CSLC CommissionMeetings](#)
Subject: June 7 meeting, agenda Item 70 - Exxon lease transfer to Sable
Date: Thursday, June 6, 2024 1:10:33 PM

Attention: This email originated from outside of SLC and should be treated with extra caution.

I will not be able to offer live public comment at tomorrow's meeting but submit the following regarding Exxon's proposed lease transfer to Sable:

I urge the State Lands Commission to deny this transfer. The proposal is another outrageous example of a large corporation offloading liability to a small speculative operation, putting taxpayers at risk for significant consequences to public health and environmental safety.

The legislature has outlined factors that you may consider in making this decision, as listed below:

Public Resources Code 6804:

(b)(1) In considering the approval of an assignment, transfer, or sublease of a lease or permit under subdivision (a), the commission may consider whether a proposed assignee is likely to comply with the terms of the lease or permit for the duration of both the primary term of the original lease or permit and any extended term of the lease because of production, as determined by all of the following factors:

(A) The proposed assignee's experience with offshore or onshore oil or gas production or mineral extraction, as applicable.

(B) Any financial or economic considerations that may affect a proposed assignee and its ability to comply with the terms of a lease or permit.

(C) Any information concerning the proposed assignee's compliance or noncompliance with other contractual obligations to the state or other government agency.

(D) Any record of noncompliance with any other laws or regulations.

The proposed transfer is exactly the kind of situation this code section is meant to address. Sable has no experience with offshore operations, is deeply in debt and its CEO has a shocking history of failed enterprises.

Given the trauma of our history of oil spill tragedies, the citizens of Santa Barbara County are expecting you to hold any applicant to the highest standards of accountability. Sable clearly does not meet those standards and the transfer must not be approved.

Respectfully submitted,
Irene Cooke

Goleta, CA

From: [Katie Davis](#)
To: [CSLC Commission Meetings](#)
Subject: June 7 meeting, agenda Item 70 - Exxon lease assignment to Sable
Date: Thursday, June 6, 2024 3:02:12 PM

Attention: This email originated from outside of SLC and should be treated with extra caution.

Recent article with background information relevant to this closed session item:
<https://www.independent.com/2024/05/17/nine-years-since-the-refugio-oil-spill/>

Nine Years Since the Refugio Oil Spill

California Must Prevent the Next One



By **Brady Bradshaw**
Fri May 17, 2024 | 5:23pm

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The oil spill just north of Refugio State Beach on May 19, 2015, coated miles of shoreline and marine habitat, and dolphins, elephant seals, sea lions, pelicans and other birds. | Credit: Paul Wellman (file)

Nine years ago, a badly corroded pipeline near Refugio State Beach ruptured and spilled what experts [now believe](#) was more than 450,000 gallons of oil. Much of the oil poured into the ocean, creating the worst spill in the Santa Barbara area since the catastrophic 1969 event that helped spur the modern environmental movement.

I understand the immense power of oil spills. My own life has been profoundly shaped by disasters like the Pipeline 901 spill, and I'm tired of watching marine life suffer.

In 2010, just days after my first time seeing a pod of dolphins in the Gulf of Mexico, my joy was suffocated beneath more than 200 million gallons of oil gushing into the Gulf from the BP Deepwater Horizon disaster. In those dark days, I couldn't look away as the ocean became a toxic slurry of death. I felt compelled to shift my priorities and abandoned my childhood dream of becoming a marine mammal veterinarian so I could join the fight to stop offshore drilling.

The Pipeline 901 rupture brought those awful memories back. This spill killed and injured brown pelicans, California sea lions, dolphins, and fish, among many other animals. Beaches and fisheries shut down as oil blanketed the coast.

The spill also shut down seven offshore oil and gas platforms that the pipeline serviced — all but three of which are now slated for decommissioning.

But the danger hasn't passed.

Efforts are underway to restart the aging and corroded oil infrastructure, despite fierce opposition from landowners, Chumash people, and environmental groups. The Pipeline 901 spill happened almost a decade ago, but many of us remember it as though it was yesterday and want to make sure nothing like it ever happens again.

Unfortunately, oil spills keep happening. In October 2021 I took a hiatus from work to decompress and enjoy the sea and my passion for diving. But when I surfaced from one of my dives in San Diego surrounded by floating tar, a few weeks after the 2021 San Pedro pipeline spill in Huntington Beach, it was a harsh reminder that the ocean isn't safe until offshore drilling stops and all platforms are decommissioned.

We simply can't count on industry to prevent another oil disaster, so we need more help from government agencies, lawmakers, and the public.

Recently a company called Sable borrowed money from Exxon and purchased the entire pipeline system, the three offshore oil-drilling platforms, and an onshore processing plant. Now it's trying every possible avenue to restart operations.

Transfers of ownership are an oil-industry shell game to avoid paying the true costs of cleanup. Often, at the end of an oilfield's life, the big companies sell their assets to an underfunded entity that then goes bankrupt, abdicating cleanup responsibility. At a time of record-breaking industry profits and a desperate need to decarbonize, there's no excuse for oil companies to avoid cleaning up their mess.

Every government agency should be skeptical of [Sable's recent efforts](#).

The state pipeline regulator, Cal Fire, should not allow the onshore Pipeline 901 to restart, especially since the agency would need to grant a waiver allowing Sable to proceed without the best possible oil-spill prevention technologies. The State Lands Commission should not renew or extend any leases for pipelines in state waters due to the significant risk of another subsea pipeline spill.

The Santa Barbara Air Pollution Control District must not renew air-pollution permits (currently open for public comment) for these shuttered operations with outdated, inadequate air-pollution controls. Before shutting down, these facilities were the largest source of greenhouse gases in Santa Barbara County and a major source of several serious air pollutants.

The federal government should stop extending the offshore oil leases in federal waters that would have expired years ago. And federal, state, and local regulators should absolutely not allow Exxon to transfer assets to Sable without requiring financial assurances for all cleanup obligations and ensuring coverage for a worst-case scenario oil spill.

Offshore drilling has to end, and governments have to stop granting permission to pollute. The risk of devastating oil spills and the cost of cleanup are too high.

As we enjoy our beautiful beaches and ocean this summer, let's not forget the seasons when we had to stay away, the precious wildlife we lost, or the dirty industry that caused it.

Brady Bradshaw is a senior oceans campaigner at the Center for Biological Diversity.

From: [Katie Davis](#)
To: [CSLC CommissionMeetings](#)
Cc: [Jonathan Ullman](#); [Lucchesi, Jennifer@SLC](#)
Subject: June 7 meeting, agenda Item 70 - ExxonMobil lease assignment to Sable.
Date: Thursday, June 6, 2024 4:52:05 PM
Attachments: [image.png](#)

Attention: This email originated from outside of SLC and should be treated with extra caution.

Dear California State Lands Commissioners,

Please consider the following information during your closed session discussion regarding, *“applications for assignment of four leases governing the use of existing offshore oil and gas pipelines traversing state waters associated with the Santa Ynez Unit in federal waters, the Ellwood Pier, and two mooring buoys, offshore Santa Barbara County.”*

This is an unusual lease assignment request. The oil operation has been shut down for nine years since a major oil spill in 2015. When operating, ExxonMobil produced 90% of the oil in the Santa Barbara Channel. Plains Pipeline was convicted of failing to maintain lines 901/903 pipeline and causing the oil spill. The pipeline was found to be badly corroded when it was visually inspected. The pipeline through state waters may have the same problems. Plains and then ExxonMobil proposed building a new pipeline and trucking the oil in the interim. Both of these plans had too many environmental impacts and were denied or withdrawn. Left with just the corroded and compromised pipeline and a risky re-start and oil operation, ExxonMobil is now attempting to avoid liability for these significant risks by loaning money to a speculative startup venture to take over operations. This is not a normal sale. It is exactly the kind of risky scheme that updates to Public Resources Code 6804(b)(1) were designed to address.

According to Public Resources Code 6804(b)(1) the commission may consider whether a proposed assignee is likely to comply with the terms of the lease or permit based on *“The proposed assignee’s experience with offshore or onshore oil or gas production or mineral extraction, as applicable.”*

Sable fails this test: *“Sable CEO James C. Flores hasn’t had the best luck with his previous oil endeavors. He served as the chief executive for PXP (Plains Exploration & Production Co.) in the early 2000s...Arizona-based Freeport-McMoRan eventually bought out PXP in 2013 and retained Flores as a CEO. He departed the company in 2016 when Freeport amassed huge amounts of debt under his leadership, a company news release stated. From there, Flores headed Sable Permian Resources, which, according to its Chapter 11 filings, went bankrupt in a hasty three years when oil prices shot down.”* ([Santa Barbara Independent](#), May 15, 2024)

According to Public Resources Code 6804(b)(1) the commission may also consider whether a proposed assignee is likely to comply with the terms of the lease or permit based on *“Any financial or economic considerations that may affect a proposed assignee and its ability to comply with the terms of a lease or permit.”*

Sable fails this test as well: Sable’s assets are net negative with over seven hundred million in debt. Sable, *“Ended the quarter with outstanding debt of \$771.2 million, inclusive of paid-in-kind interest, and cash balance of \$209.1 million.”* ([Sable Press Release](#), May 15, 2024) The Santa Barbara County Energy Division lacks confidence in their financing too. Errin Briggs, with the Energy Division of County Planning explains, *“Exxon loaned Sable more than 60 percent of the funds needed for the purchase of the unit, “making finances a concern”* ([Santa Barbara Independent](#), May 15, 2024)

This lease assignment has unusual risks: This is a large and complex operation where fracking and other well stimulation will be used, horizontal drilling extending many miles out, wastewater dumping, and other issues make the prospect of restart by a speculative and small company -- which are much more likely to cut corners and make mistakes -- a much riskier enterprise. Some additional concerns include:

- **Outdated infrastructure:** The offshore platforms and associated infrastructure, including the pipelines traversing state waters, are beyond their projected end of life and there have been numerous documented [problems with corrosion and leaks](#). The platforms were slated for decommissioning in 2020 according to the original Development and Production Plans ([1982 Plan, pg 28](#)). The platforms’ lifespan was to be “approximately 25 to 35 years” and yet it has now been 40 years since oil production began.
- **Uniquely risky and costly location:** The Gulf oil spill has cost BP \$71 billion dollars so far. A similar spill here would be even more devastating and expensive. The Southern California Coastline has the largest population and GDP of any state. The Gaviota ocean ecosystem is unique and a biodiversity hotspot.
- **Environmental justice and climate issues:** According to the ARB, when operating ExxonMobil’s

onshore operations were the largest facility source of greenhouse gas emissions in Santa Barbara County, as well as many local pollutants that cause cancer, asthma and other health issues. It's in a high fire hazard zone where operations could easily trigger fires or create highly toxic smoke if ignited.

- **Strong and wide-ranging opposition:** Opposition to ExxonMobil's restart of this operation is broad, and transferring leases to a financially risky, speculative oil company run by someone with a history of bankruptcies makes the situation even worse. During the many hearings about potential restart projects, the County has heard from many constituencies -- the cattle ranchers at Hollister Ranch, the Chumash people who have inhabited the Gaviota coast and our region for thousands of years, the Fearless Grandmas and student groups, the coastal cities, school and water district, business leaders, environmental groups that first emerged from the 1969 oil spill, people from surrounding counties, and even beyond—literally thousands of people have spoken in opposition to ExxonMobil's restart projects and multiple rallies and protests have been held over the course of several years.

All of the above should be taken into consideration when negotiating price and terms and considering the proposed change in ownership.

Regards,

Katie Davis
Chair, Sierra Club Santa Barbara-Ventura Chapter
Vice-Chair, Sierra Club California




From: [Judy Farris](#)
To: [CSLC CommissionMeetings](#)
Subject: June 7 meeting, agenda Item 70 - Exxon lease transfer to Sable
Date: Thursday, June 6, 2024 5:54:06 PM

Attention: This email originated from outside of SLC and should be treated with extra caution.

Dear members of the California State Lands Commission,

Please - please - do not approve this lease assignment to a company with no experience in offshore platforms in general and the particular pipeline problems in our environment. The company does not have the financial resources to make responsible choices in this situation even if its principals are so inclined. If Exxon, with all its expertise and dollars couldn't make it work, there is no way Sable can.

Please - please - do not approve this transfer of ownership (i.e. responsibility.)

Judy Farris
Santa Barbara CA 

From: [karen Telleen-Lawton](#)
To: [CSLC CommissionMeetings](#)
Subject: Proposed sale of Exxon to Sable
Date: Thursday, June 6, 2024 1:09:02 PM

Attention: This email originated from outside of SLC and should be treated with extra caution.

Sounds like a pretty bad idea if what I read is true:

- Sable is a startup oil company with loans from Exxon and money raised from a speculative blank check company. It has no experience with offshore oil.
- Sable is run by an oil speculator who has a history of failed companies and bankruptcies. Per [the Independent](#), *"Sable CEO James C. Flores hasn't had the best luck with his previous oil endeavors. He served as the chief executive for PXP (Plains Exploration & Production Co.) in the early 2000s...Arizona-based Freeport-McMoRan eventually bought out PXP in 2013 and retained Flores as a CEO. He departed the company in 2016 when Freeport amassed huge amounts of debt under his leadership, a company news release stated. From there, Flores headed Sable Permian Resources, which, according to its Chapter 11 filings, went bankrupt in a hasty three years when oil prices shot down."*
- Sable's [reported assets](#) are net negative with over seven hundred million in debt: *"Ended the quarter with outstanding debt of \$771.2 million, inclusive of paid-in-kind interest, and cash balance of \$209.1 million."*
- Santa Barbara County Energy Division lacks confidence in their financing too: *"Exxon loaned Sable more than 60 percent of the funds needed for the purchase of the unit, "making finances a concern," said Briggs"*
- The Southern California Coastline with the largest population and GDP of any state is the worst possible place to take a risk with a financially risky, speculative oil company run by someone with a history of bankruptcies.
- The Gulf oil spill has cost BP \$71 billion dollars so far. A similar spill here would be even more devastating and expensive.
- The platforms are well past their projected lifespan, and Sable proposes 100 drills with dubious new techniques that would likely involve fracking and other well stimulation techniques with high risk of ocean contamination. The onshore pipeline is corroded and was considered unusable by Exxon. The onshore facilities were one of the largest sources of pollution in Santa Barbara County and almost burned down during recent fires.

Please do not allow the sale!

Thanks so much,
Karen Telleen-Lawton