



March 15, 2024

Engineering Division  
Santa Barbara County Air Pollution Control District  
260 North San Antonio Road Suite A  
Santa Barbara, California 93110

**RE: Permit Re-evaluation PTOs 5651, 8092, 9100, 9101, 9102**

Mr. William Sarraf:

Sable Offshore Corp. hereby submits the permit re-evaluation for PTOs 5651, 8092, 9100, 9101 and 9102 associated with Las Flores Canyon (LFC), POPCO Gas Plant, Platform Hondo, Platform Harmony, and Platform Heritage, respectively.

We will contact your office to pay application fees by credit card.

If you have any questions or comments, please contact Patrice Surmeier at 805-567-9503 or via email at [psurmeier@sableoffshore.com](mailto:psurmeier@sableoffshore.com)

Sincerely,  
SABLE OFFSHORE CORP.

A handwritten signature in black ink that reads "Patrice Surmeier". The signature is written in a cursive, flowing style.

Patrice Surmeier  
Sr. Regulatory & Compliance Supervisor

Attachments  
APCD-01 Forms  
Title V Forms



air pollution control district  
SANTA BARBARA COUNTY

# General Permit Application Form -01

Santa Barbara County Air Pollution Control District  
260 N. San Antonio Road, Suite A  
Santa Barbara, CA 93110-1315

**1. APPLICATION TYPE** (check all that apply):

- Authority to Construct (ATC)
- Permit to Operate (PTO)
- ATC Modification
- PTO Modification
- Other (Specify)
- Transfer of Owner/Operator (use Form -01T)
- Emission Reduction Credits
- Increase in Production Rate or Throughput
- Decrease in Production Rate or Throughput

Previous ATC/PTO Number (if known)

Yes  No Are Title 5 Minor Modification Forms Attached? (this applies to Title 5 sources only and applies to all application types except ATCs and Emission Reduction Credits). Complete Title 5 Form -1302 A1/A2, B, and M. Complete Title 5 Form -1302 C1/C2, D1/D2, E1/E2, F1/F2, G1/G2 as appropriate. <http://www.ourair.org/wp-content/uploads/t5-forms.pdf>

Mail the completed application to the APCD's Engineering Division at the address listed above.

**2. FILING FEE:**

A \$420 application filing fee must be included with each application. The application filing fee is COLA-adjusted every July 1st. Please ensure you are remitting the correct current fee (the current fee schedule is available on the APCD's webpage at: <http://www.ourair.org/district-fees>). This filing fee will not be refunded or applied to any subsequent application. Payment may also be made by credit card by using the Credit Card Authorization Form at the end of this application.

**3. IS YOUR PROJECT'S PROPERTY BOUNDARY LOCATED OR PROPOSED TO BE LOCATED WITHIN 1,000 FEET FROM THE OUTER BOUNDARY OF A SCHOOL?** If yes, and the project results in an emissions increase, submit a completed Form -03 (*School Summary Form*) <http://www.ourair.org/wp-content/uploads/apcd-03.pdf>  Yes  No

If yes, provide the name of school(s)

Address of school(s)

City  Zip Code

**4. DOES YOUR APPLICATION CONTAIN CONFIDENTIAL INFORMATION?**  Yes  No

If yes, please submit with a redacted duplicate application which shall be a public document. In order to be protected from disclosure to the public, all information claimed as confidential shall be submitted in accordance with APCD Policy & Procedure 6100-020 (*Handling of Confidential Information*): <http://www.ourair.org/wp-content/uploads/6100-020.pdf>, and meet the criteria of CA Govt Code Sec 6254.7. Failure to follow required procedures for submitting confidential information, or to declare it as confidential at the time of application, shall be deemed a waiver by the applicant of the right to protect such information from public disclosure. *Note: Part 70 permit applications may contain confidential information in accordance with the above procedures, however, the content of the permit documents must be public (no redactions).*

FOR APCD USE ONLY				DATE STAMP
FID	8018	Permit No.	PT-70 Reeval 9101-R8	Rec'vd 3/18/2024
Project Name	Platform Harmony			
Filing Fee	\$491	202.E? YES / NO		

CC #5983 Stephanie B Katers

**5. COMPANY/CONTACT INFORMATION:**

<b>Owner Info</b>		<input checked="" type="radio"/> Yes <input type="radio"/> No	Use as Billing Contact?
Company Name	Sable Offshore Corp.		
Doing Business As			
Contact Name	Trent Fontenot	Position/Title	Director - Operations
Mailing Address	12000 Calle Real		
City	Goleta	State	CA Zip Code 93117
Telephone	805-567-9501	Cell	832-444-4114 Email tfontenot@sableoffshore.com

<b>Operator Info</b>		<input checked="" type="radio"/> Yes <input type="radio"/> No	Use as Billing Contact?
Company Name	Same as Owner Information		
Doing Business As			
Contact Name		Position/Title	
Mailing Address			
City		State	
Telephone		Cell	

<b>Authorized Agent Info*</b>		<input type="radio"/> Yes <input type="radio"/> No	Use as Billing Contact?
Company Name			
Doing Business As			
Contact Name		Position/Title	
Mailing Address			
City		State	
Telephone		Cell	

\*Use this section if the application is not submitted by the owner/operator. Complete APCD Form -01A ( <http://www.ourair.org/wp-content/uploads/apcd-01a.pdf> ). Owner/Operator information above is still required.

<b>SEND PERMITTING CORRESPONDENCE TO</b> (check all that apply):	
<input checked="" type="checkbox"/> Owner	<input checked="" type="checkbox"/> Operator
<input type="checkbox"/> Authorized Agent	<input type="checkbox"/> Other (attach mailing information)

**6. GENERAL NATURE OF BUSINESS OR AGENCY:**

Oil & gas exploration and production

**7. EQUIPMENT LOCATION (Address):**

Specify the street address of the proposed or actual equipment location. If the location does not have a designated address, please specify the location by cross streets, or lease name, UTM coordinates, or township, range, and section.

Equipment Address	12000 Calle Real		
City	Goleta	State	CA
		Zip Code	93117
Work Site Phone	8055679543		

Incorporated (within city limits)  Unincorporated (outside city limits)  Used at Various Locations

Assessors Parcel No(s):

**8. PROJECT DESCRIPTION:**

(Describe the equipment to be constructed, modified and/or operated or the desired change in the existing permit. Attach a separate page if needed):

Re-evaluation and renewal of Part 70 PTO 9101

**9. DO YOU REQUIRE A LAND USE PERMIT OR OTHER LEAD AGENCY PERMIT FOR THE PROJECT DESCRIBED IN THIS APPLICATION?:**  Yes  No

A. If yes, please provide the following information

Agency Name	Permit #	Phone #	Permit Date

\* The lead agency is the public agency that has the principal discretionary authority to approve a project. The lead agency is responsible for determining whether the project will have a significant effect on the environment and determines what environmental review and environmental document will be necessary. The lead agency will normally be a city or county planning agency or similar, rather than the Air Pollution Control District.

B. If yes, has the lead agency permit application been deemed complete and is a copy of their completeness letter attached?

Yes  No

Please note that the APCD will not deem your application complete until the lead agency application is deemed complete.

C. If the lead agency permit application has not been deemed complete, please explain.

D. A copy of the final lead agency permit or other discretionary approval by the lead agency may be requested by the APCD as part of our completeness review process.

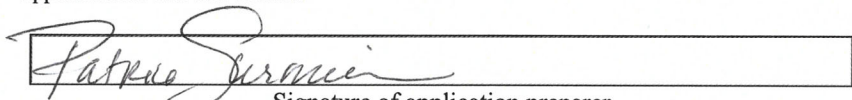
**10. PROJECT STATUS:**

- A. Date of Equipment Installation
  
- B. Have you been issued a Notice of Violation (NOV) for not obtaining a permit for this equipment/modification *and/or* have you installed this equipment without the required APCD permit(s)? If yes, the application filing is double per Rule 210.  Yes  No
  
- C. Is this application being submitted due to the loss of a Rule 202 exemption?  Yes  No
  
- D. Will this project be constructed in multiple phases? If yes, attach a separate description of the nature and extent of each project phase, including the associated timing, equipment and emissions.  Yes  No
  
- E. Is this application also for a change of owner/operator? If yes, please also include a completed APCD Form -01T.  Yes  No

**11. APPLICANT/PREPARER STATEMENT:**

The person who prepares the application also must sign the permit application. The preparer may be an employee of the owner/operator or an authorized agent (contractor/consultant) working on behalf of the owner/operator (an *Authorized Agent Form -01A* is required).

I certify pursuant to H&SC Section 42303.5 that all information contained herein and information submitted with this application is true and correct.

 Signature of application preparer	<input type="text" value="3/15/2024"/> Date
<input type="text" value="Patrice Surmeier"/> Print name of application preparer	<input type="text" value="Sable Offshore Corp."/> Employer name

**12. APPLICATION CHECKLIST** (*check all that apply*)

- Application Filing Fee (Fee = \$420. The application filing fee is COLA adjusted every July 1st. Please ensure you are remitting the current fee.) As a convenience to applicants, the APCD will accept credit card payments. If you wish to use this payment option, please complete the attached *Credit Card Authorization Form* and submit it with your application.
  
- Existing permitted sources may request that the filing fee be deducted from their current reimbursable deposits by checking this box. Please deduct the filing fee from my existing reimbursement account.
  
- Form -01T (*Transfer of Owner/Operator*) attached if this application also addresses a change in owner and/or operator status from what is listed on the current permit. <http://www.ourair.org/wp-content/uploads/apcd-01t.pdf>
  
- Form -03 (*School Summary Form*) attached if the project's property boundary is within 1,000 feet of the outer boundary of a school (k-12) and the project results in an emissions increase. <http://www.ourair.org/wp-content/uploads/apcd-03.pdf>
  
- Information required by the APCD for processing the application as identified in APCD Rule 204 (*Applications*), the APCD's *General APCD Information Requirements List* (<http://www.sbcapcd.org/eng/dl/other/gen-info.pdf>), and any of the APCD's Process/Equipment Summary Forms (<http://www.ourair.org/permit-applications>) that apply to the project.
  
- Form -01A (*Authorized Agent Form*) attached if this application was prepared by and/or if correspondence is requested to be sent to an Authorized Agent (e.g., contractor or consultant). This form must accompany each application. <http://www.ourair.org/wp-content/uploads/apcd-01a.pdf>
  
- Confidential Information submitted according to APCD Policy & Procedure 6100-020. (*Failure to follow Policy and Procedure 6100-020 is a waiver of right to claim information as confidential.*)

**13. NOTICE OF CERTIFICATION:**

All applicants must complete the following Notice of Certification. This certification must be signed by the Authorized Company Representative representing the owner/operator. Signatures by Authorized Agents will not be accepted.

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**NOTICE of CERTIFICATION**

I,  , am employed by or represent  
Type or Print Name of Authorized Company Representative

Type or Print Name of Business, Corporation, Company, Individual, or Agency

(hereinafter referred to as the applicant), and certify pursuant to H&SC Section 42303.5 that all information contained herein and information submitted with this application is true and correct and the equipment listed herein complies or can be expected to comply with said rules and regulations when operated in the manner and under the circumstances proposed. If the project fees are required to be funded by the cost reimbursement basis, as the responsible person, I agree that I will pay the Santa Barbara County Air Pollution Control District the actual recorded cost, plus administrative cost, incurred by the APCD in the processing of the application within 30 days of the billing date. If I withdraw my application, I further understand that I shall inform the APCD in writing and I will be charged for all costs incurred through closure of the APCD files on the project.

For applications submitted for Authority to Construct, modifications to existing Authority to Construct, and Authority to Construct/Permit to Operate permits, I hereby certify that all major stationary sources in the state and all stationary sources in the air basin which are owned or operated by the applicant, or by an entity controlling, controlled by, or under common control with the applicant, are in compliance, or are on approved schedule for compliance with all applicable emission limitations and standards under the Clean Air Act (42 USC 7401 *et seq.*) and all applicable emission limitations and standards which are part of the State Implementation Plan approved by the Environmental Protection Agency.

Completed By:  Title:

Date:  Phone:

Signature of Authorized Company Representative

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**PLEASE NOTE THAT FAILURE TO COMPLETELY PROVIDE ALL REQUIRED INFORMATION OR FEES WILL RESULT IN YOUR APPLICATION BEING RETURNED OR DEEMED INCOMPLETE.**

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# STATIONARY SOURCE SUMMARY (Form 1302-A2)

<b>APCD:</b> Santa Barbara County Air Pollution Control District	> APCD USE ONLY < APCD IDS Processing ID:
<b>COMPANY NAME:</b> Sable Offshore Corp.	<b>SOURCE NAME:</b> Sable – Platform Harmony

## II. TYPE OF PERMIT ACTION

	CURRENT PERMIT (permit number)	EXPIRATION (date)
<input type="checkbox"/> Initial SBCAPCD's Regulation XIII Application		
<input checked="" type="checkbox"/> Permit Renewal	9101	
<input type="checkbox"/> Significant Permit Revision*		
<input type="checkbox"/> Minor Permit Revision*		
<input type="checkbox"/> Administrative Amendment		

## III. DESCRIPTION OF PERMIT ACTION

1. Does the permit action requested involve:
- a:      Portable Source            Voluntary Emissions Caps  
           Acid Rain Source          Alternative Operating Scenarios  
           Source Subject to MACT Requirements [Section 112]

b:      None of the options in 1.a. are applicable

2. Is source operating under a Title V Program Compliance Schedule?    Yes    No

3. For permit modifications, provide a general description of the proposed permit modification:

This application is being submitted for permit re-evaluation and renewal for Part 70 PTO 9101.

\*Requires APCD-approved NSR permit prior to a permit revision submittal

# CERTIFICATION STATEMENT (Form 1302-M)

<b>APCD:</b> Santa Barbara County Air Pollution Control District	> APCD USE ONLY <
<b>COMPANY NAME:</b> Sable Offshore Corp.	<b>APCD IDS PROCESSING ID:</b>  <b>SOURCE NAME:</b> Sable – Platform Harmony

Identify, by checking off below, the forms and attachments that are part of your application. If the application contains forms or attachments that are not identified below, please identify these attachments in the blank space provided below. Review the instructions if you are unsure of the forms and attachments that need to be included in a complete application.

**Forms included with application**

Stationary Source Summary Form

Total Stationary Source Emission Form

Compliance Plan Form

Compliance Plan Certification Form

Exempt Equipment Form

Certification Statement Form

**List other forms or attachments**

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

[ ] check here if additional forms listed on back

**Attachments included with application**

\_\_\_ Description of Operating Scenarios

\_\_\_ Sample emission calculations

\_\_\_ Fugitive emission estimates

\_\_\_ List of Applicable requirements

\_\_\_ Discussion of units out of compliance with applicable federal requirements and, if required, submit a schedule of Compliance

\_\_\_ Facility schematic showing emission points

\_\_\_ NSR Permit

\_\_\_ PSD Permit

\_\_\_ Compliance Assurance monitoring protocols

\_\_\_ Risk management verification per 112(r)

I certify under penalty of law, based on information and belief formed after reasonable inquiry, that the information contained in this application, composed of the forms and attachments identified above, are true, accurate, and complete.

I certify that I am the responsible official, as defined in SBCAPCD's Regulation XIII, Rule 1301 or USEPA's 40 CFR Part 70.

Signature of Responsible Official  Date 3/15/2024

Print Name of Responsible Official: Trent Fontenot

Title of Responsible Official and Company Name: Director - Operations



**CERTIFICATION STATEMENT  
(Form 1302-M continued)**

<b>APCD:</b> Santa Barbara County Air Pollution Control District	<b>&gt; APCD USE ONLY &lt;</b> <b>APCD IDS PROCESSING ID:</b>
<b>COMPANY NAME:</b> Sable Offshore corp.	<b>SOURCE NAME: Sable – Platform Harmony</b>

**List Other Forms or Attachments (cont.)**

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# STATIONARY SOURCE SUMMARY (Form 1302-A1)

APCD: Santa Barbara County Air Pollution Control District

COMPANY NAME: Sable Offshore Corp.

## ➤ APCD USE ONLY ◀

APCD IDS Processing ID:

Application #:

Date Application Received:

Application Filing Fee\*:

Date Application Deemed Complete:

### I. SOURCE IDENTIFICATION

1. Source Name: Sable – Platform Harmony
2. Four digit SIC Code: 1311 USEPA AIRS Plant ID (for APCD use only):
3. Parent Company (if different than Source Name): Sable Offshore Corp.
4. Mailing Address of Responsible Official: 12000 Calle Real, Goleta, CA 93117
5. Street Address of Source Location (include Zip Code): 12000 Calle Real, Goleta, CA 93117
6. UTM Coordinates (if required) (see instructions):
7. Source located within: 50 miles of the state line  Yes  No  
50 miles of a Native American Nation  Yes  No  Not Applicable
8. Type of Organization:  Corporation  Sole Ownership  Government  
 Partnership  Utility Company
9. Legal Owner's Name: Sable Offshore Corp.
10. Owner's Agent Name (if any): NA Title: Telephone #:
11. Responsible Official: Trent Fontenot Title: Director - Operations Telephone #: 805-567-9501
12. Plant Site Manager/Contact: Trent Fontenot Title: Director - Operations Telephone #: (805)-567-9501
13. Type of facility: Oil and Gas Processing Facility
14. General description of processes/products: See Section 2 of Part 70 PTOs 9101
15. Does your facility store, or otherwise handle, greater than threshold quantities of any substance on the Section 112(r) List of Substances and their Thresholds (see Attachment A)?  Yes  No The facility is not subject to the RMP during the preservation period and notified the EPA of de-registration on March 22, 2017.
16. Is a Federal Risk Management Plan [pursuant to Section 112(r)] required?  Not Applicable  Yes  No  
(If yes, attach verification that Risk Management Plan is registered with appropriate agency or description of status of Risk Management Plan submittal.)

\* Applications submitted without a filing fee will be returned to the applicant immediately as "improper" submittals

# TOTAL STATIONARY SOURCE EMISSIONS (Form 1302-B)

<b>APCD:</b> Santa Barbara County Air Pollution Control District	> APCD USE ONLY < <b>APCD IDS Processing ID:</b>
<b>COMPANY NAME:</b> Sable Offshore Corp.	<b>SOURCE NAME:</b> Sable- Platform Harmony

## I. TOTAL STATIONARY SOURCE EMISSIONS

Provide a brief description of operating scenario:

POLLUTANT * (name)	EMISSIONS (tons per year)	PRE-MODIFICATION EMISSIONS (tons per year)	EMISSIONS CHANGE (tons per year)
No change in emissions requested for this renewal application			

\* Emissions for all pollutants for which the source is major and for all NSPS/MACT-regulated air pollutants must be reported. HAP emissions must be determined, and those exceeding one ton per year from any emission unit category must also be quantified; if less than one ton per year, just list the HAPs emitted by name.

# EXEMPT EMISSIONS UNITS (Form 1302-H)

<b>APCD:</b> Santa Barbara County Air Pollution Control District	> APCD USE ONLY < <b>APCD IDS Processing ID:</b>
<b>COMPANY NAME:</b> Sable Offshore Corp.	<b>SOURCE NAME:</b> Sable- Platform Harmony

Are you claiming any emitting activities to be insignificant? (See definition at bottom of page)

YES  NO

**I. ACTIVITIES CLAIMED TO BE INSIGNIFICANT (Attach supporting calculations)**

Activity	Description of Activity/Emission Units	Potential to Emit for each Pollutant
	See existing insignificant activity list/discussion in current permit. Table 5.7 - Estimate Exempt Emissions	

Insignificant activities are defined in APCD Rule 1301 (definitions). For an activity to be considered insignificant emissions cannot exceed 2 tons per year potential to emit (PTE) any criteria pollutants, and 0.5 tons per year for any regulated HAP.

Note: Insignificant activities are not exempt from Part 70 requirements/permits.

# COMPLIANCE PLAN (Form 1302-I1)

<b>APCD:</b> Santa Barbara County Air Pollution Control District	> APCD USE ONLY < <b>APCD IDS Processing ID:</b>
<b>COMPANY NAME:</b> Sable Offshore Corp.	<b>SOURCE NAME:</b> Sable- Platform Harmony

## I. PROCEDURE FOR USING FORM 1302-I

☞ This form shall be submitted as part of the SBCAPCD's Regulation XIII Application. The Responsible Official shall identify the applicable federal requirement(s) to which the source is subject. In the Compliance Plan (Form 1302-I), a Responsible Official shall identify whether the source identified in the SBCAPCD's Regulation XIII Application currently operates in compliance with all applicable federal requirements.

## II. APPLICABLE FEDERAL REQUIREMENTS

Applicable Federal Requirement <sup>1</sup>	Affected Emission Unit	In compliance? (yes/no/exempt <sup>3</sup> )	Effective Date <sup>4</sup>
Regulatory Reference <sup>2</sup>	Regulation Title <sup>2</sup>		
See Section 3 of existing Part 70 PTO 9101			
40 CFR Part 63 Subpart ZZZZ	NESHAP for Stationary Reciprocating Internal Combustion Engines Crane, emergency production generator, emergency drilling generator, emergency firewater pumps	Yes	3/9/2011
40 CFR Part 60 Subpart IIII	NSPS for Compression Ignition Engines Cement pump skid & cutting reinton pump	Yes	7/11/2006

- 1 Review APCD SIP Rules, NSPS, NESHAPS, and MACTs .
- 2 Regulatory Reference is the abbreviated citation (e.g. 40 CFR 60 Subpart OOO, APCD Rule 325.H) and Title is the prosaic title (e.g. NSPS Standards of Performance for Nonmetallic Mineral Processing Plants, Crude Oil Production and Separation, Inspection)
- 3 If exempt from applicable federal requirement, include explanation for exemption.
- 4 Indicate the date during the permit term that the applicable federal requirement will become effective for the emission unit.

Other Applicable Federal Requirements <sup>5</sup>	Affected Emission Unit	In compliance?	Effective Date
See existing Part 70 PTO 9101	See Permit	Yes	April 2018

5 All environmentally significant permit conditions -- such as emission, operation, and throughput limitations or compliance monitoring conditions associated with such limitations -- listed in all authority to construct (ATC) permits issued to the Part 70 source are also applicable requirements.

\*\*\* If more than one page is used, please ensure that "Santa Barbara APCD", stationary source name and "Form 1302-I1" appear on each page. \*\*\*

# COMPLIANCE PLAN (Form 1302-I2)

<b>APCD:</b> Santa Barbara County Air Pollution Control District	> APCD USE ONLY < APCD IDS Processing ID:
<b>COMPANY NAME:</b> Sable Offshore Corp.	<b>SOURCE NAME:</b> Sable- Platform Harmony

### III. COMPLIANCE CERTIFICATION

**Under penalty of perjury, I certify the following:**

x **Based on information and belief formed after reasonable inquiry, the source identified in this application will continue to comply with the applicable federal requirement(s) with which the source is in compliance identified in form 1302-I1;**

**Based on information and belief formed after reasonable inquiry, the source identified in this application will comply with the future-effective applicable federal requirement(s) identified in form 1302-I1, on a timely basis<sup>1</sup>;**

Based on information and belief formed after reasonable inquiry, the source identified in this application is not in compliance with the applicable federal requirement(s), identified in form 1302-I1, and I have attached a compliance plan schedule.<sup>2</sup>

  
 \_\_\_\_\_  
 Signature of Responsible Official

15 March 2024  
 \_\_\_\_\_  
 Date

1. Unless a more detailed schedule is expressly required by the applicable federal requirement.
2. At the time of expected permit issuance, if the source expects to be out of compliance with an applicable federal requirement, the applicant is required to provide a compliance schedule with this application, with the following exception. A source which is operating under a variance that is effective for less than 90 days need not submit a Compliance Schedule. For sources operating under a variance, which is in effect for more than 90 days, the Compliance Schedule is the schedule that was approved as part of the variance granted by the hearing board.

The compliance schedule shall contain a schedule of remedial measures, including an enforceable sequence of actions with milestones, leading to compliance with this applicable federal requirement. For sources operating under a variance, the compliance schedule is part of the variance granted by the hearing board. The compliance schedule shall resemble, and be at least as stringent as that contained in any judicial consent decree or administrative order to which the source is subject. For sources not operating under a variance, consult the Air Pollution Control Officer regarding procedures for obtaining a compliance schedule.