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RE: Completion of the Periodic Review Development and Production Plan for Platform Heritage

Background

Under its regulations, the Marine Minerals Administration (MMA , formerly BOEM) will periodically review the activities conducted under the approved Development and Production Plan (DPP) and may require operators to submit updated information on their activities. MMA will base the frequency and extent of this review on the significance of any changes in available information and onshore or offshore conditions affecting or affected by the activities in the approved DPP.

On May 22, 2024, BOEM approved the Record Title Assignment for the offshore California Santa Ynez Unit (SYU) properties (Lease Numbers: OCS-P 0180, 0181, 0182, 0183, 0187, 0188, 0189, 0190, 0191, 0192, 0193, 0194, 0195, 0326, 0329 and 0461) from Exxon Mobil Corporation (MMA REEL Company No. LA 00276) to Sable Offshore Corp. (MMA REEL Company No. LA 03726).

SYU was shut-in in June 2015 following the May 2015 Refugio onshore pipeline oil spill and returned to production in 2025. This oil spill occurred at an onshore segment of the pipeline that is outside the jurisdiction of MMA.

MMA Resource Evaluation, Environment & Leasing Division in the Pacific Region (MMA REEL) reviewed the DPP for Platform Heritage pursuant to the Outer Continental Shelf Lands Act (OCSLA) and the MMA implementing regulations at 30 CFR § 550.284(a), which states, “The Regional Supervisor will periodically review the activities you conduct under your approved EP, DPP, or DOCD and may require you to submit updated information on your activities. The frequency and extent of this review will be based on the significance of any changes in available information and onshore or offshore conditions affecting, or affected by, the activities in your approved EP, DPP, or DOCD.”

This memorandum provides the results of MMA REEL's periodic review of the DPP for Platform Heritage. MMA REEL will complete the review of the DPP for the other platform in the SYU, Hondo, after MMA Production and Development, Regional Field Operations, and Data Division in the Pacific Region (MMA PROD) pre-production safety inspections are completed.

Review Process and Determination

MMA REEL identified and reviewed the DPP for Platform Heritage. The documents reviewed are listed below and each is further discussed in the following section.

1. "Programmatic Environmental Impact Statement for Oil and Gas Decommissioning Activities on the Pacific Outer Continental Shelf," BOEM and BSEE (October 2023 EIS No. 2023-0145) (Decommissioning PEIS).
2. Final Environmental Impact Report (EIR) for the Rincon Phase 2 Decommissioning Project, California State Lands Commission (CSLC), July 2024 (Final EIR for Rincon).
3. Reports on the May 2015 onshore Refugio oil spill affecting the pipeline that transports production from Federal platforms in SYU to the onshore processing facility (Reports on May 2015 Refugio Oil Spill).

    A. "2015 Refugio Oil Spill After-Action Report and Improvement Plan," Santa Barbara County Office of Emergency Management, July 6, 2016 (SB OEM After-Action Report).

    B. "REFUGIO OIL SPILL RESPONSE EVALUATION REPORT: Summary and Recommendations from the Office of Spill Prevention and Response," California Department of Fish and Wildlife Office of Spill Prevention and Response (CDFW Spill Response), May 2016 (CDFW Report).

    C. "Refugio Beach Oil Spill Final Damage Assessment and Restoration Plan/Environmental Assessment," California Department of Fish and Wildlife, California State Lands Commission, California Department of Parks and Recreation, University of California, The Department of the Interior, U.S. Fish and Wildlife Service, and the National Oceanic and Atmospheric Administration, June 2021 (Damage Assessment).

    D. "Failure Investigation Report Plains Pipeline, LP, Line 901Crude Oil Release, May 19, 2015, Santa Barbara County, California," Pipeline and Hazardous Materials Safety Administration (PHMSA), May 2016 (PHMSA Report).

    E. Consent Decree. *United States v. Plains All American Pipeline, L.P. and Plains Pipeline, L.P., Civil Action No. 2:20-cv-02415* (C.D. Cal 2020) (Consent Decree).
4. Requirements associated with oil spill blowout (30 CFR § 550.243(h)) and oil spill financial responsibility (OSFR) for offshore facilities (30 CFR Part 553) (Oil Spill Blowout and OSFR).
5. "Finding Of No Significant Impact ExxonMobil/Sable Offshore Corporation Lease

Extension of the Santa Ynez Unit Environmental Assessment" from BOEM and BSEE, May 2025 (Lease Extension FONSI).

6. Letter titled "Pre-Production Testing, Platform Heritage, Santa Ynez Unit" from former BSEE, dated March 30, 2026 (BSEE Inspection Result Letters).
7. Annual Plans of Operation (APOs) provided to BSEE by SYU operators for every year between 2010 and 2015 (prior to 2015 shut-in), including proposed unit development and operation activities and the 2026 APO post-resumption of production (APOs).
8. "Offshore Oil and Gas Development and Production Activities in the Southern California Planning Area, Biological Assessment, Endangered and Threatened Species," BOEM, September 2023 (2023 BA) and "Endangered Species Act Section 7(a)(2) Biological and Conference Opinion: Development and Production of Oil and Gas Reserves and Beginning Stages of Decommissioning within the Southern California Planning Area of the Pacific Outer Continental Shelf Region," (consultation #2023-02183 issued on February 27, 2024 (2023 BA and 2024 BiOp)).
9. MMA REEL Reviewed the Following Other Information Sources:
    A. "Programmatic Environmental Assessment of the Use of Well Stimulation Treatments (WST) on the Southern California Outer Continental Shelf," BOEM and BSEE, February 2016 (PEA on WST).
    B. Historical data for flaring and venting activity reported for the SYU from January 31, 1985, through June 30, 2026, the latest information available in the Technical Information Management System (TIMS).
    C. Historical and recent oil and gas production data reported for the SYU from January 31, 1985, through June 30, 2026, the latest information available in TIMS.
    D. "Port Access Route Study: The Pacific Coast From Washington to California" (Docket No. USCG–2021–0345) as published by the United States Coast Guard (USGS), June 5, 2023 (PAC-PARS).
    E. National Pollutant Discharge Elimination System (NPDES) Permit issued by the U.S. Environmental Protection Agency (EPA) (NPDES Permit).
    F. "Worst Case Discharge Analysis (Volume I)" and "Oil Spill Response Equipment Capabilities Analysis (Volume II)," BSEE, February 29, 2016 (WCD Reports).
    G. Reserves.
    H. Production Rates

<u>The review resulted in the following findings</u>:

1. No additional revisions to the DPP for Platform Heritage are needed at this time.

2. Recent revisions to all DPPs in the BOEM Pacific Region, including for Platform Heritage, were required and completed in November 2024 to incorporate mandatory Terms and Conditions from the 2024 BiOp.

Findings of Periodic Review of Platform Heritage DPP

1. Decommissioning PEIS.

   A. No revision required to the Platform Heritage DPP due to the contents of this document. The Decommissioning PEIS is a programmatic document that does not prescribe outcomes; MMA REEL Pacific will conduct further project-specific environmental reviews when decommissioning applications are submitted to MMA PROD Pacific.

2. Final EIR for Rincon.

   A. No revision required to the Platform Heritage DPP due to the contents of this document. The State of California's ongoing decommissioning efforts for oil and gas facilities in State waters are within the level of impacts analyzed in the original Platform Heritage DPP and associated Final Environmental Impact Statement/Report (EIS/EIR). The decommissioning of Rincon analyzed in the EIR, and other reviews done by the CSLC, did not describe those actions as overlapping with the Platform Heritage DPP. Information about the Rincon Island Decommissioning is not included in the DPP for Platform Heritage because it is a State waters project that is not tied to Platform Heritage operations. It was considered to determine if the decommissioning of Rincon Island, which is a new project, would have an effect on the Platform Heritage operations but MMA REEL review determined there is no effect.

3. Reports on the May 2015 Refugio Oil Spill.

   A. Santa Barbara (SB) Office of Emergency Management (OEM) After-Action Report.

      i. Plains All American Pipeline, L.P. and Plains Pipeline, L.P. (Plains) were the owner and operator of the pipeline (Line 901) that leaked onshore and migrated to waters offshore California. The Line 901 pipeline section which ruptured is entirely onshore and not regulated within the Federal jurisdiction.

      ii. No revision required to the Platform Heritage DPP. The purpose of the SB OEM 2015 Refugio Oil Spill After-Action Report and Improvement Plan is to identify areas of strength and opportunities for improvement based on the lessons learned associated with the County's response to the onshore oil spill that migrated to State waters. The report focuses on the planning, organization, equipment, training, and exercise capabilities, and opportunities for improvement specific to the County.

   B. CDFW Report.

i. No revision required to the Platform Heritage DPP due to the contents of this document. This CDFW Report is an After-Action Report summarizing the CDFW Spill Response efforts for the May 19, 2015, Refugio Oil Spill. CDFW Spill Response serves as the lead State agency for oil spills in State waters and is the designated State On-Scene Coordinator for oil spills responses. The CDFW Report is an internal evaluation of performance and documents successes, challenges, best practices, and recommendations for improvement for State agency response. The CDFW Report contains a list of recommendations to assess CDFW's internal performance during the Refugio oil spill, including recommendations on coordination with Federal agencies (although the report does not specifically mention BOEM or BSEE, predecessors to MMA. The current MMA PROD-approved Oil Spill Response Plan (OSRP) for SYU, dated September 2026, references coordination of spill response activities with CDFW. MMA PROD Oil Spill Preparedness Division is responsible for oversight and compliance with OSRP.

C. Damage Assessment.

i. No revision required to the Platform Heritage DPP due to the contents of this document. This Damage Assessment and Restoration Plan and Environmental Assessment (DARP/EA) has been prepared by the California Department of Fish and Wildlife, California State Lands Commission, California Department of Parks and Recreation, University of California, the Department of the Interior (DOI), U.S. Fish and Wildlife Service, and the National Oceanic and Atmospheric Administration relating to the May 19, 2015, Refugio Beach Oil Spill. The document serves two purposes: 1) The document describes the injuries resulting from the spill and the restoration projects selected to compensate the public for those injuries, and 2) the document serves as an Environmental Assessment intended to satisfy the Trustee's requirement to evaluate the environmental impacts of the proposed restoration projects under NEPA.

D. PHMSA Report.

i. No revision required to the Platform Heritage DPP due to the contents of this document.

ii. On May 19, 2015, PHMSA issued a Corrective Action Order (CAO - CPF No. 5-2015-5011H, as amended) to shut down and purge Line 901. PHMSA later investigated and issued an investigative report on May 19, 2016. In their failure investigation report on the Refugio Oil Spill, PHSMA indicated that the proximate or direct cause of failure on Line 901 was external corrosion. At the time of rupture, Line 901 was operated by Plains. Line 901 transported heated crude from the ExxonMobil storage tanks in Las Flores Canyon westward to the Gaviota Pump Station, at a distance of approximately ten and seven tenths

(10.7) miles. The pipeline section which was ruptured is entirely onshore and not regulated by MMA.

iii. Findings from the PHMSA report state that historical cathodic protection records for Line 901 were reviewed and revealed protection levels that are typically sufficient to protect non-insulated coated steel pipe. However, the report notes that Lines 901 and 903 were insulated and there was an increasing frequency and extent of corrosion anomalies noted during in-line inspections. Ultimately PHMSA determined that the pipeline's cathodic protection system in the onshore portion of the pipeline outside federal jurisdiction was not effective in preventing corrosion from occurring beneath the pipeline's coating and insulation system. Cathodic protection requirements to mitigate corrosive events are required by the DPP.

iv. Cathodic protection is required in at 30 CFR § 250.1002. MMA PROD inspections provide oversight into its inclusion in pipelines, called rights-of-way (ROW). No information contained in the PHMSA report implicates operations at the Las Flores facility or any of the offshore facilities as a contributing factor to the Refugio Oil Spill. Further, MMA regulates pipelines within Federal waters. For example, MMA PROD monitors pipelines and inspects the facilities for safety and compliance with regulatory standards. The conditions for approval of the pipeline ROWs between Platform Heritage and Platform Harmony require that the operator keep oil and gas pipelines in good working order.

E. Consent Decree.

i. On May 19, 2015, PHMSA issued a Corrective Action Order (CAO - CPF No. 5- 2015-5011H, as amended) to shut down and purge Line 901. PHMSA investigated and issued an investigation report on May 19, 2016. A consent decree was signed between the parties, the Trustees, which include DOI; United States Department of Commerce, on behalf of the National Oceanic and Atmospheric Administration; CDFW; California Department of Parks and Recreation; California State Lands Commission; and the Regents of the University of California, and the Defendants, Plains, in March 2020.

ii. The Consent Decree is an order approved by the U. S. District Court for the Central District of California before the trial of any claims and without adjudication or admission of any issue of fact or law and with the consent of the Parties. In the Consent Decree, the Defendants, Plains, agreed to the upgrade of leak detection system and additional training for employees who monitor the leak detection system. After the Refugio oil spill, the Trustees and the Defendants entered a cooperative Natural Resource Damage (NRD) Assessment process pursuant to 15 CFR § 990.14, the Trustees and Defendants jointly and independently planned and conducted a number of injury assessment activities, including gathering and analyzing data and other information that the Trustees

used to determine and quantify resource injuries and damages. The Trustees identified several categories of injured and damaged natural resources and determined the cost to restore, rehabilitate, replace, or acquire the equivalent of injured natural resources. By entering this voluntary Consent Decree, Defendants did not admit or agree that the Trustees' NRD findings and determinations were accurate. Defendants instead agreed to several actions they would undertake without admitting fault.

iii. No revision required to the Platform Heritage DPP due to the contents of this document. The approved DPP already requires training in emergency response relating to the leak detection system. MMA PROD inspected the leak detection system on Platform Heritage. The operator made several updates to components that were approved by MMA PROD. MMA PROD determined that the leak detection system meets the requirements of the regulations found at 30 CFR § 250.240(f).

4. Oil Spill Blowout and OSFR.

A. Regarding oil spill blowout, MMA REEL reviewed requirements regarding Blowout Preventers (BOP), OSRP, and worst-case discharge (WCD) scenarios.

i. The approved WCD scenario from 2011 includes a statement that the Blow Out Prevention Equipment (BOPE) meets or exceeds the standards as defined in regulations 30 CFR Part 250.

ii. The WCD scenario is comprised of three components: 1) topside discharge, 2) pipeline rupture, and 3) uncontrolled wellbore (blowout). MMA PROD Pacific is responsible for verifying the topside and pipeline rupture components of the scenario, while MMA REEL is responsible for calculating the blowout components. MMA REEL also reviewed the WCD Reports (*See* 10(F) below).

iii. The WCD for the blowout component has remained the same since first evaluated by Bureau of Ocean Energy Management, Regulation and Enforcement (BOEMRE), a predecessor agency to BOEM in 2011. While no immediate action is required, MMA REEL may need to reevaluate the WCD for the blowout scenario based on information contained in an Application for Permit to Drill (APD) should Sable propose to drill a new well;

a. Changes in downhole reservoir conditions within either the Pre-Monterey or Monterey formations may affect the existing WCD. Information contained in the APD may be cause for re-evaluation of the blowout WCD. Should drilling resume, MMA REEL and MMA PROD would coordinate their respective review of any proposed well prior to drilling. These reviews typically occur when the operator submits an APD to MMA PROD.

B. Per 30 CFR Part 254, MMA PROD Pacific reviews and approves OSRPs. MMA PROD Pacific approved the OSRP for SYU in September 2026. Per 30 CFR Part 254, the current MMA PROD approved Oil Spill Response Plan (OSRP) for Sable is valid as of the MMA PROD confirmation email dated October 5, 2026. Per 30 CFR § 254.30, MMA PROD requires operators to review and, if applicable, update their OSRP every two years. Updates to the OSRP do not precipitate updates to the DPP. Rather, the inclusion of an initial OSRP is required for approval of the DPP. If there are changes to the OSRP, MMA PROD Pacific reviews and approves those changes. MMA PROD Oil Spill Preparedness Division is responsible for oversight and compliance with OSRP.

C. An operator is required to demonstrate OSFR for a Covered Offshore Facility based on a table matrix depicted in 30 CFR § 553.13(b)(1). The financial amount is based on a tiered WCD volume amount. As of November 20, 2026, MMA REEL has confirmed that the OSFR is in compliance.

D. No revision required to the Platform Heritage DPP due to the contents of these documents.

   i. Oil spill blowout (30 CFR § 550.243(h)) and oil spill financial responsibility for offshore facilities (30 CFR Part 553) were considered and are compliant. The WCD for the blowout component has remained the same since first evaluated by BOEMRE, a predecessor agency to BOEM and MMA in 2011. While no immediate action is required, MMA REEL may need to reevaluate potential blowout changes to downhole reservoir conditions in the Monterey Formation and scenarios that target pre-Monterey formations in future proposed drilling programs.

5. Lease Extension FONSI

A. BOEM and BSEE prepared an Environmental Assessment to determine if there were any environmental impacts that would occur if BSEE approved a lease extension per 30 CFR § 250.180(e). The Proposed Action evaluated in the EA is for BSEE to review and either approve or deny a lease extension request for leases in the SYU.

B. No revision required to the Platform Heritage DPP due to the contents of this document. The EA evaluated extending the lease term to allow a return to existing, permitted production. BSEE's review of the EA and supporting documents determined that the lease extension will not significantly affect the quality of the human environment within the meaning of Section 102(2)(c) of NEPA. The mitigations and best practices identified in the EA/FONSI were incorporated as requirements for approval for this lease extension.

6. BSEE Inspection Result Letters.

A. To address concerns regarding the continued safe operation of the SYU Platform Heritage, MMA (formerly BOEM) made a request to MMA PROD (formerly BSEE), asking for a summarization of its inspection and testing program and to indicate if the results of the SYU inspections and testing are in accordance with regulatory requirements in anticipation of restart of production.

B. In a later letter dated March 30, 2026, BSEE acknowledged that all safety systems on Platform Heritage have been successfully tested, as required by 30 CFR § 250.800, with this work completed on March 29, 2026.

C. No revision required to the Platform Heritage DPP due to the contents of these documents. Because SYU is being restarted in phases, MMA PROD will provide results from ongoing inspections to MMA REEL that are specific to each platform upon MMA PROD completion in anticipation of restart of production. Currently, Platform Heritage and Harmony have met all MMA PROD inspection requirements for restart of production while inspections in anticipation of restart of production at the other SYU platform, Platform Hondo, remain ongoing.

7. APOs.

A. MMA REEL Pacific coordinated with MMA PROD to receive information about activities captured in the Annual Plans of Operation (APOs) for SYU to determine if any existing or currently planned future activities would trigger a revision of the approved DPP. An APO contains information about the planned operations of the Platform for the year. MMA REEL reviewed the APOs from 2010-2015 and the post-production resumption APO from 2026.

B. Note is made to a proposed removal of drilling rigs and derricks from the SYU platforms in order to allow for a future planned well workover and drilling campaign using mobile drill rigs and/or workover rigs. On November 18, 2026, MMA PROD confirmed that Sable had not initiated any formal actions or requests to remove the existing rigs as outlined in the APO. MMA will evaluate any future requests concerning the removal or replacement of drilling rigs, derricks, or related equipment when those requests are submitted to determine if revisions to the DPP are required.

C. No revision required to the Platform Heritage DPP due to the contents of these documents. MMA REEL Pacific determined the information provided in the APOs does not trigger a DPP revision.

8. 2023 BA and 2024 Biological Opinion.

A. No revision required to the Platform Heritage DPP due to the contents of these documents.

B. MMA entered into consultation with the National Marine Fisheries Service (NMFS) resulting in a biological opinion in 2024, the "Endangered Species Act Section 7(a)(2) Biological and Conference Opinion: Development and Production of Oil and

Gas Reserves and Beginning Stages of Decommissioning within the Southern California Planning Area of the Pacific Outer Continental Shelf Region," (consultation #2023-02183 issued on February 27, 2024 (2024 BiOp)).

C. MMA REEL's 2023 BA supported the BiOp and updated species information, potential oil spill trajectories, and information from nearby oil spills. The assessment included a discussion of physical and behavioral effects to endangered species from sound (noise), collision hazards, water pollution, and oil spills.

D. The 2024 BiOp with NMFS includes non-discretionary terms and conditions related to reporting. On November 20, 2024, BOEM notified all southern California operators of mandatory DPP revisions to incorporate the new terms and conditions described in the 2024 BiOp. This DPP revision added new reporting requirements related to vessel use and the unlikely event of a collision with marine wildlife. Sable completed this mandatory revision in November 2024.

9. MMA REEL Reviewed the Following Other Information Sources:

A. PEA on WST.

i. No revision required to the Platform Heritage DPP due to the contents of this document. If any lessee were to propose a WST that was not already a part of an approved DPP, the lessee would be required to provide an update to their DPP and MMA REEL Pacific would be required to conduct additional analyses under the National Environmental Policy Act and the Coastal Zone Management Act.

B. Flaring.

i. OGOR-B Reports

a. MMA REEL Pacific reviewed gas disposition volumes reported in thousand-cubic feet (MCF) via monthly Oil and Gas Operation Reports, type B (OGOR-B) (See 30 CFR § 250.1163 for reporting requirements). These monthly reports stored within TIMS contain gas disposition as reported at the unit level, which here is a sum of all the platforms in SYU. MMA REEL queried TIMS for monthly gas disposition coded to flaring and venting between January 31, 1985, and June 30, 2026, which is the most recent data available TIMS. Per 30 CFR § 250.1163(c), the operator keeps a log on the platform that contains information about the continuous 48 hour flaring that MMA PROD inspectors inspect. Per 30 CFR § 250.1160(a)(2), if flaring extends beyond 48 hours of continuous flaring, then an additional permit for short- or long-term flaring is required.

b. No revision required to the Platform Heritage DPP due to the contents of these documents.

c. The DPP contains a description of flaring equipment as part of a pressure relief system. Therefore, the DPP recognizes the need for flaring but does not state any specific volume limits. Outer continental shelf (OCS) Environmental Assessments show the proposed activities conducted through the life of the project for the three SYU platforms were expected to exceed the DOI air quality exemption (MMS regulations 30 CFR § 250.57) and were therefore analyzed. The air emission analysis showed that peak annual emissions for the unit would occur in 1992 and 2000, depending on the field development option. Results from this analysis were reported in emission rates by compound. Reported data shows that flaring activity reached its' peak during January 1994 at 578 MCF per day. This roughly corresponds with the expected peak in air emissions during 1992. Immediately prior to shut-in (2015) flaring for the entire unit was averaging 250 MCF per day over a 12-month period. This volume is less than half the volume flared during the peak period. Reported data shows that flaring activity reached its' peak during January 1994 at 578 MCF per day. This roughly corresponds with the expected peak in air emissions during 1992. MMA REEL queried TIMS for monthly gas disposition coded to flaring and venting between January 31, 1985, and June 30, 2026 - the last available data. For the most recent 12-month period between June 30, 2025, and June 30, 2026, the entire SYU has averaged a daily flaring rate of 182 MCF per day. This volume is less than one-third the volume flared during the peak period. Flaring is within the limits found within the Platform Heritage DPP approval.

ii. Air Quality

a. Air quality impacts from flaring fall under the jurisdiction of the Santa Barbara County Air Pollution Control District (SBCAPCD), which receives its authority by delegation from the EPA. On September 4, 1992, the EPA Administrator promulgated requirements (40 CFR Part 55) to establish air pollution control requirements for permitting, monitoring, fees, compliance, and enforcement for OCS sources subject to the CAA. EPA delegated authority to the SBCAPCD on November 8, 1993, to implement and enforce the requirements of 40 CFR Part 55. EPA delegated authority to the Ventura County Air Pollution Control District on January 27, 1994. Regulations at 40 CFR § 55.14 require OCS sources to comply with applicable onshore air quality rules in the corresponding onshore area when an OCS source is located at or within 25 nm from the State Seaward Boundary. Separate flaring and venting regulations are implemented by MMA PROD under 30 CFR § 250.1160 and 30 CFR § 250.1161. These regulations outline conditions when gas may be flared or vented, some of which require approval by the MMA PROD Regional Supervisor.

b. No revision required to Platform Heritage DPP due to the contents of these documents. MMA REEL does not have jurisdiction over air quality permits in the State of California. Local air quality permitting and control districts have the jurisdiction to implement air quality permits for Platform Heritage

through the Santa Barbara Air Pollution Control District (SBAPCD). A validly authorized permit is in effect for Platform Heritage. A review of information on the SBAPCD website shows approved permits to operate for the Platform Heritage in SYU. The permit for Platform Heritage (facility number 08018) can be viewed on the SBAPCD website here https://map.ourair.org/.

C. Oil and Gas Production Data.

i. MMA REEL reviewed oil production volumes reported in barrels via monthly Oil and Gas Operation Reports, type A (OGOR-A) (See 30 CFR § 250.1163 for reporting requirements) from January 31, 1985, through June 30, 2026, the latest information available in TIMS. In April 2025 production from the Santa Ynez Unit resumed and production began to be reported. Between April 2025 and June 2026, the 12-month average daily production rate for the entire Santa Ynez Unit averaged 8,309 barrels per day. Of this, Platform Heritage contributed 35% of daily oil production, or approximately 2,900 barrels per day.

ii. No revision required to the Platform Heritage DPP due to the contents of this document. The production rates reported in OGOR-A are within the limits found in the Platform Heritage DPP.

D. PAC-PARS.

i. The U. S. Coast Guard (USCG) Traffic Separation Scheme (TSS) and proposed fairways take existing platform operations into consideration. The study established voluntary fairways for coastwise and nearshore vessel traffic to promote safety of navigation in the study area while the TSS is a specific area where vessel traffic is regulated to reduce the risk of collisions by separating opposing traffic flows.

ii. No revision required to the Platform Heritage DPP due to the contents of this document. These requirements are voluntary, managed by USCG, and do not require changes to the DPP.

E. NPDES Permit.

i. No revision required to the Platform Heritage DPP due to the contents of this document. Platform Heritage is permitted and covered under NPDES General Permit CAG280000 General Permit: Southern California Offshore Oil and Gas Exploration, Development and Production Operations. The permit establishes effluent limitations, prohibitions, reporting requirements, and other conditions on discharge from oil and gas facilities engaged in production, field exploration, developmental drilling, well completion, well treatment operations, well workover, and abandonment operations. The EPA issued NPDES General Permit CAG280000 on December 20, 2013; it is now expired. However, under 40 CFR § 122.6 an expired permit continues in force under 5 USC § 558(c) until the effective date of a new permit. MMA REEL is in communication with EPA as they work to re-issue the permit.

F. WCD Reports.

i. Volume I, Worst Case Discharge Analysis, presents regional profiles regarding the range and type of WCDs associated with U.S. offshore drilling, and illustrates their potential for impacting the environment through oil spill fate and transport modeling. Volume II, Oil Spill Response Equipment Capabilities Analysis, presents a series of related analyses, including spill modeling using different response countermeasures, to reduce the potential for impacts, and develop recommendations for oil spill response plan requirements for all Regions within MMA PROD.

ii. No revision required to the Platform Heritage DPP due to the contents of these documents. Oil spill blowout (30 CFR § 550.243(h)) and oil spill financial responsibility for offshore facilities (30 CFR Part 553) were considered and are discussed above (*See* number 4).

G. Reserves.

i. The DPP contains a statement on field reserves (Section 1.1) stating the reserves are predicted to be depleted within 25-35 years (i.e. 2022).

ii. No revision required to the Platform Heritage DPP due to the contents of these documents. The reserves information provided by an operator at the time of DPP approval are not routinely updated or generally used for any other purpose other than initial approval of the DPP itself. MMA REEL is required by the OCS lands act to ". conduct a continuous investigation with the purpose of determining the availability of all oil and natural gas produced or located on the OCS" as part of the MMA REEL Reserves Inventory Program. In their 1987 DPP submittal ExxonMobil calculated the oil reserves for SYU at between 300 to 400 million barrels and also forecast the reserves would be depleted within 25-35 years, based on then-available information and expected production. Separately, the Minerals Management Service (MMS), a predecessor agency to BOEM, calculated the original reserves from the three oil fields in the SYU at 698 million barrels. MMA REEL has continuously updated the government reserves calculation as part of the Reserves Inventory Program. The last annual MMA REEL reserves evaluation was published in December 2025 in the Field Reserve Estimate Summary report (FRRE report). The FRRE report shows that the remaining reserves for the Pescado field produced by Platform Heritage in the Santa Ynez Unit as approximately 33 million barrels. This approximately 33-million-barrel figure serves as the current official government remaining reserves value and is used for such decisions as forecasting energy supply, informing policy decisions, and assuring fair market value.

H. Oil and Gas Production Rates.

i. No revision required to the Platform Heritage DPP due to the contents of these documents.

ii. 30 CFR 550.243(c)(1) requires a DPP containing estimates of average and peak rates of production. Production profiles included in the original DPPs satisfy this requirement and show predicted rates for oil and gas (Figure 3.2) and treated water (Figure 7.36). Section 9.5.1 of the DPP describes the onshore treating plant (Las Flores Facility) as expandable to process a peak oil production rate of 140,000 barrels of oil per day (4,200,000 barrels per month). Figure 3.2 depicts an average base production rate of 100,000 barrels per day (3,000,000 barrels per month). Monthly production reporting to MMA shows that monthly production for SYU has reported volumes from January 31,1985, through June 2026, the last available data reported in TIMS. The 12-month (calculated between June 2025 and June 2026) average daily oil production rate for the entire Santa Ynez Unit averaged 8,309 barrels per day. Of this, Platform Heritage contributed 35% of daily oil production, or approximately 2,900 barrels of oil per day. The last reported monthly oil rates are within capacity of the onshore treatment facility considered in the DPP.

iii. Production forecasting is a complex process and cannot guarantee 100% accuracy. Production forecasts are based on various factors such as reservoir characteristics, historical oil and gas production data, well performance, other geologic interpretations, engineering parameters, and methodology. At the time of submission and approval, the production forecasts presented in the DPP were based on the best available information obtained from exploratory wells and geologic interpretations. As additional data is obtained during field development, production forecasts will be assessed and updated, but there is no requirement to proactively provide a current production forecast to MMA REEL. Production information is reported monthly to MMA PROD via Oil and Gas Operation Reports (OGORs) and made available to MMA REEL. MMA REEL uses the oil and gas production data, in conjunction with other data sources, to conduct an independent annual reserve evaluation, which includes a production forecast. A plot of combined oil production data shows peak oil production was reached in October 1995.

Recommended Next Steps

1. MMA REEL will notify the SYU operator that the review of the SYU DPP covering Platform Heritage is complete and that the review resulted in the following findings:

   A. A revision will not be required to the Platform Heritage DPP.