

**Status of Lawsuits Impeding Sable Offshore Corporation Attempts to Restart  
Santa Ynez Las Flores Canyon Oil and Gas Pipelines CA-324 and CA-325  
February 9, 2026**

Lawsuit and Filing Date	Court	Synopsis of Lawsuits and Court Rulings
(1) Sable Offshore Corp. (Sable) et al vs California Coastal Commission (CCC), Feb. 18, 2025	Superior Court of California, County of Santa Barbara, Case No. 25CV00974	<p>Filing</p> <ul style="list-style-type: none"> <li>This case involves a lawsuit filed By Sable against the CCC for issuing Cease and Desist Orders (CDOs) prohibiting Sable from conducting Las Flores Canyon (LFC) pipeline repair and maintenance operations.</li> <li>The CDOs issued by the CCC included an \$18 million fine, and a restoration order against Sable for conducting unpermitted pipeline repair and maintenance work damaging the coastal zone.</li> </ul> <p>Court Rulings</p> <ul style="list-style-type: none"> <li>On October 15, 2025, Judge Thomas Anderle ruled against Sable, confirming that the pipeline repair work conducted by Sable required a Coastal Development Permit (CDP) from the CCC.</li> </ul> <p>Status</p> <ul style="list-style-type: none"> <li>On December 12, 2025, Sable filed a Motion for Reconsideration, arguing compliance with CCC requirements interferes with U.S Department of Transportation’s (DOT) Pipeline Hazardous Materials Safety Administration (PHMSA) regulatory jurisdiction over the LFC pipelines.</li> <li>A hearing on Sable’s Motion for Reconsideration is scheduled on February 18, 2026..</li> </ul>
(2) Sable Declaratory Judgement Against the State of California September 29, 2025	Superior Court of California, County of Kern	<p>Filing</p> <ul style="list-style-type: none"> <li>This case involves a declaratory judgement filed by Sable against the State of California seeking to confirm that the pipeline permitting provisions of a new state law (SB 237) do not apply to Sable’s LFC pipelines.</li> </ul> <p>Senate Bill 237 Requirements</p> <ul style="list-style-type: none"> <li>SB 237 clarifies in the California Coastal Act that the repair, reactivation, and maintenance of an oil and gas facility that has been idled, inactive, or out of service for five years or more is considered a new or expanded development requiring a new Coastal Development Permit (CDP).</li> <li>SB 237 also requires the CCC or local government with a certified local coastal program to review and approve, modify, condition, or deny the CDP, as provided.</li> </ul> <p>Sable Argument</p> <ul style="list-style-type: none"> <li>Sable claims the application of SB 237 to the Santa Ynez Pipeline System is preempted by federal law (Pipeline Safety Act of 2011 administered by PHMSA).</li> <li>Sable also argues the LFC pipelines are not subject to SB 237 because the Santa Ynez pipeline system is not “idle, inactive, or out of service,” and because the Legislature did not give SB 237 retroactive effect.</li> </ul> <p>Status</p> <ul style="list-style-type: none"> <li>No final ruling has been reported on this specific case as of early February 2026.</li> </ul>

<p>(3) Sable, ExxonMobil (XOM) et al vs. Santa Barbara County, and Santa Barbara County Board of Supervisors May 8, 2025</p>	<p>United States District Court, Central District of California, Case No. 25-4165-DMG</p>	<p>Filing</p> <ul style="list-style-type: none"> <li>On May 8, 2025, Sable, XOM et al filed suit against Santa Barbara (SB) County and the SB County Board of Supervisors for failure to approve the ownership transfer of the Santa Ynez facility Final Development Plan (FDP) permits held by XOM to Sable.</li> <li>Sable requested the court to force the county to transfer the permits to Sable and claimed the denial of the transfer of ownership would be an unlawful seizure of private property.</li> </ul> <p>Court Rulings</p> <ul style="list-style-type: none"> <li>On September 12, 2025, Judge Dolly Gee declined Sable’s request and instead sent the issue back to the Board of Supervisors, saying it was required to vote on the issue again within 60 days of the court’s decision.</li> </ul> <p>Status</p> <ul style="list-style-type: none"> <li>On November 3, 2025, the SB County Board of Supervisors, on a 4-1 vote, denied approving LFC ownership transfer from XOM to Sable.</li> <li>Sable and XOM have vowed to continue litigating this matter.</li> </ul>
<p>(4) Environmental Defense Center (EDC), Center for Biological Diversity (CBD) et al vs PHMSA (Pipeline and Hazardous Materials Safety Administration) Department of Transportation, and agency heads. December 24, 2025</p>	<p>U.S. Ninth Circuit Court of Appeals Agency, Docket No. 2025-1502 Case No. No. 25-8059</p>	<p>Filing</p> <ul style="list-style-type: none"> <li>This case involves an emergency lawsuit filed by EDC et al against PHMSA challenging PHMSA approval of an emergency permit on December 23, 2025, to restart the LFC pipeline system, arguing it was rushed and bypassed required public notification and environmental reviews.</li> <li>The lawsuit sought to halt the restart due to concerns about pipeline safety, citing past spills and inadequate state/federal reviews.</li> </ul> <p>Court Rulings</p> <ul style="list-style-type: none"> <li>The U.S. Court of Appeals for the Ninth Circuit denied the emergency request by EDC et al to stay PHMSA approval on December 31, 2025, thus denying the plaintiffs request to halt the restart of the Sable LFC pipelines, and recognizing federal oversight of the pipelines by PHMSA.</li> <li>Sable and Pacific Pipeline Company have been granted leave to intervene in the case.</li> <li>The Court held an expedited hearing on January 26, 2026, to address the underlying issues, including whether the 2020 Consent Decree requiring OSFM approval of LFC pipeline restart is binding.</li> <li>Briefings on this case are scheduled to be completed in March.</li> </ul>
<p>(5) California State Attorney General (SAG) and OSFM vs PHMSA January 23, 2026</p>	<p>U.S. Ninth Circuit Court of Appeals Case Number / Docket Number: 26-381</p>	<p>Filing</p> <ul style="list-style-type: none"> <li>On January 23, 2026, SAG sued to block PHMSA from taking regulatory control of Sables LFC pipelines from OSFM.</li> <li>The SAG alleges this was an “unlawful power grab” intended to bypass California’s strict safety and environmental regulations.</li> <li>The SAG alleges PHMSA’s actions were arbitrary and capricious and violated the Administrative Procedures Act.</li> </ul> <p>Status</p>

		<ul style="list-style-type: none"> <li>The case is ongoing.</li> </ul>
<p>(6) CBD, and EDC et al vs California Dept. of Forestry and Fire Protection et al - California Office of the State Fire Marshall (OSFM) April 15, 2025, and June 3, 2025</p>	<p>Superior Court of the State of California, Santa Barbara County, Case No. 25CVO2244 Case No. 25CVO2247</p>	<p>Filing</p> <ul style="list-style-type: none"> <li>This case involves two lawsuits filed by CBD et al, and the EDC et al against OSFM for failing to conduct an environmental review and provide an opportunity for public comment before issuing a cathodic protection waiver for the LFC pipelines.</li> </ul> <p>Background</p> <ul style="list-style-type: none"> <li>On December 17, 2024, OSFM approved Sable's implementation of enhanced pipeline integrity standards for the LFC pipelines by granting State waivers of certain regulatory requirements related to cathodic protection and seam weld corrosion.</li> <li>On February 11, 2025, PHMSA notified the OSFM that PHMSA did not object to OSFM's granting of the State waivers.</li> <li>On October 22, 2025, OSFM sent a letter to Sable informing Sable that based on required pipeline till inspection tolerances, Sable had not met the requirement for granting State waivers that all anomalies having a wall loss greater than 40 percent must be remediated (repaired) before the restart of the LFC pipelines.</li> <li>In an October 23, 2025, letter to OSFM, Sable objected to OSFM's interpretation of the State Waiver conditions, specifically the tool tolerance requirements (see Sable's 8-K filing on October 24, 2025, for more information).</li> </ul> <p>Court Rulings and Actions Taken by Sable</p> <ul style="list-style-type: none"> <li>On June 3, 2025, the SB County Superior Court (Judge Donna Geck) issued a temporary restraining order preventing OSFM from taking any action towards restarting Sable's LFC pipelines.</li> <li>The judge's injunction order found that OSFM likely violated state/federal pipeline safety laws by failing to provide a statement of reasons justifying its finding that the LFC pipelines will be safe to operate despite the lack of an effective cathodic protection system to prevent corrosion.</li> <li>On July 18, 2025, Judge Geck issued a tentative ruling narrowly granting the motions for preliminary injunctions prohibiting the restart of Sable's LFC pipelines.</li> <li>The order required Sable to come back to the court after receiving all outstanding approvals and then gives environmental groups a 10-day period to seek further relief from the court.</li> <li>On January 5, 2026, Sable filed a motion for reconsideration, requesting the injunction be lifted arguing that oversight has shifted exclusively to PHMSA rendering the injunction moot.</li> <li>Judge Geck scheduled a hearing for February 27, 2026, to consider Sable's argument that federal law preempts state authority to regulate the pipeline</li> </ul> <p>Status</p> <ul style="list-style-type: none"> <li>The State Attorney General's Office has stated it is exploring its options to protect OSFM's authority, indicating that Sable's request for reconsideration of the injunction could be a drawn-out process.</li> </ul>

<p>(7) States of Washington, California, et al vs Donald Trump et al</p>	<p>United States District Court, Wester District of Washington at Seattle No. 2:25-cv-00869</p>	<p>Filing</p> <ul style="list-style-type: none"> <li>On May 9, 2025, California Attorney General Rob Bonta co-led a coalition of 14 state attorneys general (AGs) in filing a lawsuit challenging President Donald Trump’s January 20, 2025, Executive Order (EO 14156) entitled “Declaring a National Energy Emergency,”</li> <li>In the lawsuit, the AGs allege that the President’s directive, and federal agencies’ subsequent implementation of it, violate multiple federal laws, including the Administrative Procedure Act.</li> <li>The AGs also alleged that the President’s emergency declaration does not meet the definition of “emergency,” as per the National Emergencies Act.</li> <li>The AGs requested the court declare the executive order unlawful, that the agencies’ efforts to carry it out are arbitrary, capricious, and unlawful, and to enjoin any actions related to emergency permitting by the agencies.</li> </ul> <p>President Trumps National Energy Emergency Declaration</p> <ul style="list-style-type: none"> <li>President Trump declared a national energy emergency based on the finding the “United States insufficient energy production, transportation, refining and generation constitutes and unusual and extraordinary threat to our Nation’s economy, national security and foreign policy.”</li> <li>The EO directs agencies, such as PHMSA, to “identify and use all lawful emergency or other authorities available to them to facilitate the supply, refining and transportation of energy in and through the west coast of the United States ...”</li> </ul> <p>PHMSA LFC Pipeline Decisions</p> <ul style="list-style-type: none"> <li>In December 2025, PHMSA notified Sable that the LFC pipelines were determined by PHMSA to be interstate pipelines pursuant to the Pipeline Safety Act and issued a special emergency permit to Sable that approved the restart of the LFC pipelines.</li> <li>In its “Special Emergency Permit Analysis and Findings,” for the LFC pipelines PHMSA stated approval of the special permit was in accordance with the President Trumps’ EO and will mitigate the risks of fuel shortages on the west coast by reducing United States dependency on imported oil.</li> </ul> <p>Status</p> <ul style="list-style-type: none"> <li>The case is ongoing in federal district court.</li> </ul>
<p>(8) State Attorney General (SAG) vs Sable October 3, 2025</p>	<p>Not Available</p>	<p>Filing</p> <ul style="list-style-type: none"> <li>This case involves a lawsuit filed by the SAG against Sable in the SB Superior Court, saying it illegally discharged waste into waterways.</li> <li>The complaint alleges that Sable “placed profits over environmental protection in its rush to get oil on the market,” carrying out 144 excavations between October 2024 and May 2025 that cut through creeks, wetlands, and riparian corridors without authorization.</li> <li>The lawsuit was filed at the request of the Central Coast Regional Water Quality Control Board..</li> <li>Violations could carry penalties of \$5,000 per day per site.</li> </ul> <p>Sable Argument</p> <ul style="list-style-type: none"> <li>Sable argues the pipeline maintenance and repair work was conducted in compliance with existing permits issued by SB County and monitored by OSFM.</li> </ul>

		<p>Status</p> <ul style="list-style-type: none"> <li>On November 4, 2025, a hearing was held on the criminal case in the SB Superior Court.</li> <li>In January 2026, Judge Donna Geck kept an injunction in place preventing immediate restart of the LFC pipelines.</li> <li>The criminal case is ongoing..</li> </ul>
<p>(9) Santa Barbara County District Attorney (SBDA) vs Sable September 16, 2025</p>	<p>Santa Barbara County Superior Court, Case No. 25CR07677</p>	<p>Filing</p> <ul style="list-style-type: none"> <li>This case involves a lawsuit filed by SBDA against Sable for unauthorized LFC pipeline repair and maintenance work.</li> <li>The 21 criminal counts include five felony charges of knowingly discharging a pollutant into a waterway, and 16 misdemeanors, including allegations of unlawful obstruction of a streambed.</li> </ul> <p>Sable Argument</p> <ul style="list-style-type: none"> <li>Sable has called the allegations “misleading”, stating that repairs were supervised by independent biologists and OSFM personnel.</li> <li>Sable argues that PHMSA now has exclusive authority over the LFC pipelines, super ceding state/county oversight.</li> </ul> <p>Status</p> <ul style="list-style-type: none"> <li>A case management conference is scheduled for February 13, 2026, and the parties have scheduled mediation for April 8, 2026.</li> </ul>
<p>(10) CBD et al vs Bureau of Safety and Environmental Enforcement (BSEE) and Sable (Intervenor) June 27, 2024</p>	<p>United State District Court, Central District of California, Western Division, Case 2:25-cv-02840</p>	<p>Filing</p> <ul style="list-style-type: none"> <li>This case involves a lawsuit filed by CBD et al against BSEE for unlawfully renewing the Santa Ynez Unit (SYU) federal OCS leases in November 2023.</li> <li>CBD argued BSEE’s National Interest Determination (NID) failed to consider several highly relevant factors (climate crisis, Endangered Species Act, environmental justice etc.).</li> <li>CBD also argued BSEE failed to conduct any environmental review under NEPA of the environmental impacts of extending XOM’s leases.</li> </ul> <p>Background</p> <ul style="list-style-type: none"> <li>In 2023, BSEE deemed the SYU lease extensions categorically excluded from NEPA and determined that no extraordinary circumstances existed that would make application of the categorical exclusion inappropriate.</li> </ul> <p>BOEM Actions and Court Rulings</p> <ul style="list-style-type: none"> <li>BOEM requested that the court remand the challenged action so that the agency could revise its NEPA and NID analyses.</li> <li>In its request for a remand, BSEE identified deficiencies in the completeness and sufficiency of both the NEPA categorical exclusion review and NID analysis that were performed and stated it had requested BOEM to prepare a NEPA Environmental Assessment (EA) to evaluate the potential environmental effects of lease extension.</li> </ul>

		<ul style="list-style-type: none"> <li>On March 21, 2025, Judge Michelle Williams denied BSEE's request for a "voluntary remand," which would have paused the lawsuit while the agency performed a new environmental review.</li> <li>On May 28, 2025, BOEM/BSEE released a NEPA EA and a Finding of No Significant Effect (FONSI) for SYU lease extensions.</li> <li>Plaintiffs argue BSEE's May 2025 decision and EA was completed in bad faith, was improperly predetermined, was unreasonably slanted, and/or was substantively inadequate pursuant to the relevant case law.</li> </ul> <p>Status</p> <ul style="list-style-type: none"> <li>BSEE/BOEM lodged an updated administrative record on December 19, 2025.</li> <li>A hearing on plaintiffs' motion to compel completion and supplementation of the administrative record is scheduled for March 13, 2026.</li> <li>The case is now active, with both sides presenting arguments regarding the legality of the lease extensions.</li> </ul>
(11) CBD et al vs. Bureau of Ocean Energy Management (BOEM) April 2, 2025	United States District Court, Central District of California, Western Division, Case 2:25-cv-02840	<p>Filing</p> <ul style="list-style-type: none"> <li>This case involves a lawsuit filed by the CBD et al against BOEM for not complying with the Outer Continental Shelf Act (OCSLA) which requires Sable to revise its Development and Production Plans (DPPs) for platforms and other facilities located on the federal OCS.</li> <li>The CBD claims that BOEM has not complied with non-discretionary mandates (triggers) under the OCSLA that require Sable to update its SYU DPPs.</li> <li>The triggers include "when operations would result in a significant increase in the volume of oil and gas production, an increase in air pollution that exceeds the amounts specified in an approved plan, or a significant increase in water pollution."</li> </ul> <p>BOEM Actions</p> <ul style="list-style-type: none"> <li>On April 30, 2025, BOEM completed a periodic review of the SYU Unit DPP for Platform Harmony pursuant to OCSLA and the BOEM implementing regulations at 30 CFR § 550.284(a) and determined no revisions to the DPP were needed at that time. (Note - Sable plans a phased return-to-production of the SYU facilities beginning with Platform Harmony).</li> <li>BOEM had previously completed a revision to the Platform Harmony DPP in December 2024. This revision incorporated Terms and Conditions from 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 National Marine Fisheries Service (NMFS) (consultation #2023-02183).</li> <li>On October 9, 2025, Sable reported that it had updated its Platform Harmony DPP to utilize an Offshore Storage and Treatment Vessel (OS&amp;T) and has requested expedited permitting support from BSEE and other federal agencies.</li> </ul>

		<ul style="list-style-type: none"> <li>• BOEM review of Sable’s OS&amp;T DPP revisions is ongoing.</li> </ul> <p>Status</p> <ul style="list-style-type: none"> <li>• On September 10, 2025, Judge Michelle Williams allowed the lawsuit to proceed, rejecting intervenor Sable's attempt to dismiss the case.</li> <li>• Plaintiffs filed their motion for summary judgment on December 12, 2025.</li> <li>• The federal governments and Sable’s respective oppositions to plaintiffs’ motion for summary judgment and cross-motions for summary judgment are currently due in February 2026.</li> </ul>
(12) Investor Class Action Lawsuit Against Sable July 28, 2025	United States District Court, Central District of California, Case 2:25-cv-06869	<p>Filing</p> <ul style="list-style-type: none"> <li>• On July 28, 2025, investors filed a class action lawsuit (Johnson v. Sable Offshore Corporation) against Sable for violations of the federal securities laws; the plaintiffs alleged Sable made false and misleading statements in a Sable May 19, 2025, News Release that reported Sable had restarted oil and gas production at SYU, and anticipated sales from the LFC pipeline system in June 2025.</li> <li>• Plaintiffs seek to recover compensable damages caused by Sable’s violations of the federal securities laws under the Securities Act of 1933 and the Securities Exchange Act of 1934 (the “Exchange Act”).</li> </ul> <p>Status</p> <ul style="list-style-type: none"> <li>• The case is ongoing, focusing on appointing proper lead counsel and managing discovery.</li> </ul>