air pollution control district
SANTA BARBARA COUNTY

NOTICE OF EXEMPTION

TO: Clerk of the Board
County of Santa Barbara
105 East Anapamu Street - Room 407
Santa Barbara, CA 93101

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

Project I.D.: Permit to Operate (PTO) 15962 01, PTO 15978 01, Authority to Construct (ATC) 16435, ATC 16459, and ATC 16460
Project Title: Platforms Hogan and Houchin Plugging and Abandonment Project
Project Applicant: DCOR, LLC
Project Location: Carpinteria Field – South County, Parcel Outer Continental Shelf (OCS)-P-0166

Project Description: For the purposes of review under the California Environmental Quality Act (CEQA) and the District's *Regulation VIII, New Source Review*, the project consists of the actions described in District permits no. PTO 15962 01, PTO 15978 01, ATC 16435, ATC 16459, and ATC 16460. These permits authorize operations and equipment in support of the plugging and abandonment (P&A) of oil and gas wells associated with Platform Hogan and Platform Houchin. Specifically, the subject permits will authorize: the installation and operation of a new, portable crane and associated Tier 4 Final engine; the replacement of the Platform Hogan South Unit Crane engine with a new Tier 4 Final diesel-fired engine; the use of up to six (6) prime power, diesel engines for the purposes of well abandonment to be located on the abandonment rig; the use of one (1) additional diesel engine for emergency electrical power use in instances of power outages and disruptions that may be transported between platforms; and increases to the annual flaring limits at the platforms to support blowdowns of wells and perform end-of-life abandonments. P&A work will start at Platform Hogan and move to Platform Houchin sequentially as P&A operations cannot be conducted simultaneously due to the specialty equipment associated with the P&A process. The estimated completion of the P&A program at Platform Hogan is expected to be prior to the end of 2027. P&A work at Platform Houchin is anticipated to take an additional 1-2 years to complete.

Exempt Status:
CEQA Section(s):

- ☐ Ministerial (Section 21080 (b)(1); 15268)
- ☐ Declared Emergency (Section 21080(b)(3); 15269(a))
- ☐ Emergency Project (Section 21080(b)(4); 15269(b)(c))
- ☒ Categorical Exemption (Cite section: __15308 Protection of the Environment__)
- ☐ Statutory Exemption (Cite section: _____)

Other Basis for Exemption:

- ☐ General "Common Sense" Exemption under CEQA Guidelines Section 15061(b)(3)
- ☒ District CEQA Guidelines, Appendix A "District List of Exempt Projects" (Cite section: __Section 1.f.__)

Reasons Why Project is Exempt:

The project is exempt from further environmental review pursuant to CEQA Guidelines Section 15308 [Protection of the Environment] because the project involves actions taken by the regulatory agency to assure protection of the environment. The project will facilitate the abandonment of offshore oil wells that

are currently leaking and releasing fugitive hydrocarbon emissions into the ambient air. When Platform Hogan and Platform Houchin were returned to the former lease holders in late 2020, it was discovered the platforms were significantly deteriorated and that they could not comply with certain District requirements. Platforms Hogan and Houchin are out of compliance with District Rules 331.D, E, G.1, and I and 206, Part 70 Permit to Operate 9108-R5 and Part 70 Permit to Operate 9109-R5, Conditions 9.C.2.a, 9.C.2.b.i and 9.C.2.b.ii related to fugitive hydrocarbon component emission limits, operational limits, and leak and repair requirements in the well bay. The operator has been unable to conduct P&A work on leaking wellheads due to significant facility updates that were needed to address work health and safety concerns at the platforms. Of the 39 wells at Platform Hogan, 14 wells have been identified as wells with fugitive emissions that are not able to be mitigated until a well rig is installed. Platform Houchin consists of a 60-wellhead platform, with 35 leaking wells. Most of the necessary facility updates have been completed at Platform Hogan and the operator is now ready to commence well P&A activities.

The project can also be found exempt from CEQA pursuant to *Appendix A: APCD List of Exempt Projects* of the *District's Environmental Review Guidelines*, Section 1.f. [Projects undertaken exclusively for the repair, maintenance or minor modification of existing sources involving negligible or no expansion of use beyond that previously existing] because the purpose of the project is to abandon existing oil and gas wells, as a prerequisite to the eventual full decommissioning of the subject platforms. The existing and former use of the platforms as an oil and gas production facility will not be expanded but rather eliminated altogether.

Section 15300.2 of the State CEQA Guidelines lists exceptions that would prohibit a project from qualifying for a categorical exemption. The District considered the applicability of the listed exceptions and concludes that none of the exceptions apply. Therefore, for the reasons described, the project qualifies for the cited categorical exemptions. Further information and supporting documentation can be found in the District's administrative permit files.

Date of Project Approval/Permit Issue Date: October 24, 2025

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Signature:

Alex Economou

Alex Economou, Planning Division Manager

Date: 10/20/2025

Aeron Arlin Genet, Air Pollution Control Officer