



## MEMORANDUM

**To:** File

**From:** Padilla, Daniel I., Regulatory

**CC:**

**Date:** 07/06/2011

**Subject:** Reserve Pit Closure Mitchell 32-6

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This memorandum documents Oxy's reserve pit closure located on the Mitchell 32-6 pad. The pad is located in SENW, Section 32, Township 9S, Range 94W, Mesa County, Colorado. The pad is fee owned. In accordance with COGCC rules in effect at the time of pit closure, specifically Rules 907.a, b, and c, 909 a, b, e. Rule 910 a, & b. The pit was backfilled and soil samples collected to verify compliance with COGCC Table 910-1. The analytical results confirm that the pit met allowable concentration levels for all analytes except for Arsenic (As). Based on the analytical results, background samples were collected to account for the elevated levels of As post reclamation. The background samples revealed As levels that were greater than or equal to the post reclamation As levels. Oxy will submit a Form 4 Sundry notice to request that the COGCC allow this pit to be closed as is.

Additional information as follows:

- This reserve pit supported drilling and initial completion activities for up to 7 wells, which include:
  - Mitchell Fed. 32-4, API # 05-077-09085
  - Mitchell 32-3, API # 05-077-09086
  - Mitchell Fed. 32-11, API # 05-077-09087
  - Mitchell Fed. 32-12, API # 05-077-09088
  - Mitchell 32-7, API # 05-077-09089
  - Mitchell 32-6, API # 05-077-09108
  - Mitchell Fed. 32-5, API # 05-077-09109
- The pit bottom was sampled for closure September 29, 2009 by Walsh Environmental Scientists and Engineers, LLC. Based on the sampling results of the pit bottom, except for As, all analytes were found to be below allowable concentration levels per the COGCC's table 910-1 rules that were in effect after the 2008 amended rules, which went into effect on April 1, 2009 for fee lands and July 1, 2009 for federal lands. The tabulated and original analytical lab data are attached.
- Background sampling was conducted on May 06, 2010 by Walsh Environmental Scientists and Engineers, LLC. Background samples revealed As concentrations to be greater than or equal to the post reclaim concentrations. The tabulated and original analytical lab data is attached.
- Final reclamation of the pad will be completed once the last producing well on this pad has been P&A'ed.

Attachments: Tabulated laboratory analytical data  
Laboratory Analytical Report