

OXY is requesting approval of a variance to Rule 603.f. to convert an existing annex pad to a storage area. Per my email communication with Dave Kulmann on 06/16/2014, the variance falls under Rule 603.f. A Land Use Change permit was submitted to Garfield County on 02/05/2015.

The proposed the 697-16-16 pad storage site is designed to be approximately 0.71 acres for the storage pad and 4.82 acres for the site perimeter. The 697-16-16 site is centrally located on parcel 2169-214-00-026. OXY USA WTP LP is the surface and mineral owner for this location.

The 697-16-16 pad location was previously developed as a COGCC-permitted well pad site and currently has 10 producing wells located on the lower tier of the well pad. The storage area will be located at the upper tier of the pad. The lower tier is not included in the proposed storage site perimeter acreage figures.

The purpose of the proposed storage site is to increase efficiency of storage and transportation of equipment and supplies. The storage site is located to support existing and future facilities and well pads within the OXY Cascade Creek field. The proposed storage site will reduce overall heavy traffic on county roads by allowing vehicles to transport equipment and supplies within OXY's property.

The following summarizes the equipment that is currently existing and proposed for the 697-16-16 pad site.

Existing:

- 10 producing wells
- Frac Tanks (8)
- Completion Tanks (2)
- 400 barrel Upright Tanks (34)

Proposed:

- Gravel Pad (25 ft. x 25 ft.)
- Various equipment and supplies

Equipment and supplies stored at the proposed site will consist of, but is not limited to, separators, natural gas production equipment, fuel storage, piping, piping connections, well head equipment, ladders, secondary containment parts, and stormwater control supplies. Any liquids or semi-solid materials will be stored in a secondary containment.

Storage of fuels or any flammable materials will be stored on the gravel pad, approximately 25 feet by 25 feet, to reduce the impact in the event of a wildfire. The location of fuel storage will depend on the storage of other materials. All stored combustible and/or flammable materials will comply with Garfield County Wildfire Hazards Standards, Section 7-206.

It is not anticipated that liquids will be stored at the proposed sites, however, in the event that liquids need to be stored OXY will implement its existing Cascade Creek Spill Prevention Control and Countermeasure Plan (SPCC) and BMPs to prevent spills of liquids. Any spill that occurs will be cleaned up immediately and disposed of properly. All liquids and semi-solids on-site will have secondary containment installed.

Weed control will be maintained to prevent wildfire from entering the site.

The proposed site has been designed to mitigate potential risks to wildlife. The 604-12-13 Annex pad site location is previously developed and no additional impacts are anticipated.

The proposed storage site will not require personnel to be staffed at the site and personnel will only access the proposed site for loading/unloading activities.

The access road to the site location is owned and maintained by OXY.

The proposed site was previously developed and no grading activities will be required. The only construction activities for the proposed storage site will be the delivery of gravel. Gravel delivery will result in an estimate of two dump truck vehicles accessing the site.

Vehicle activities during the operations phase are not expected to be daily, but rather intermittent with three (3) vehicles for stormwater inspections and vegetation management every month. Upgrades to drainage features and erosion BMPs will occur during monthly trips, using equipment located within OXY property. The equipment and materials that will be brought to the facilities are from near-by well pads and will be reused in the general area. The proposed storage use is expected to generate fewer additional trips to the public roads by providing a place for extra materials and equipment that would otherwise be hauled in or out of the larger field.

Existing swales and sediment basin will allow for drainage of the site. The site is located so that no water flows onto the location from any direction. Snow will be directed towards BMPs. Plowed snow will be placed near the outer boundary of the pad allowing pad swales to collect the snow melt and route it to the sediment traps. OXY will utilize engineering and operational BMPs to limit runoff. The site has been designed for stormwater to flow away from the site.

All storage will occur in the graded area with low-to-no slopes. Areas with slopes of 20% or greater occur at the perimeter on the site boundary and outside the site boundary. If excessive erosion occurs on the steep slopes, erosion control blankets shall be installed and the area reseeded and mulched as needed until sufficient vegetation is re-established to prevent erosion.

Proposed reclamation will be similar to or better than existing site conditions. Disturbed cut and fill slopes from the pads will be hydro-mulched and seeded with a seed mix consisting of a diversity of native or desirable non-native species capable of supporting the post-disturbance land use. Vegetation will be established and growing within 2 growing seasons based on 80% coverage as compared to surrounding native vegetation coverage.