Glenn Springs Holdings, Inc.
A Subsidiary of Occidental Petroleum Corporation

Frank A. Parigi
Vice President and General Counsel
Direct Dial (972) 687-7503

14555 Dallas Parkway
Dallas, Texas 75254
Email: frank_parigi@oxy.com

March 17, 2020

Via Certified Mail

91 7199 9991 7034 1581 2045

Ms. Rebecca Weber
Director – Air and Waste Management Division
U.S. Environmental Protection Agency, Region 7
RCRA Corrective Actions and Permitting Branch
11201 Renner Blvd. – Mail Code AWMD
Lenexa, Kansas 66219

Re: Financial Assurance
Occidental Chemical Corporation
Wichita, Kansas 67215
EPA ID No. KSD 007 482 029

Dear Ms. Weber:

The enclosed letter from the Chief Financial Officer of Occidental Petroleum Corporation is provided to demonstrate Occidental Petroleum Corporation's ability to utilize the corporate self-guarantee option to cover current cost estimates associated with operations at the Wichita Plant, which is operated by its subsidiary, Occidental Chemical Corporation.

You will also find enclosed the Corporate Guarantee, a copy of the consolidated financial statements as of December 31, 2019 for Occidental Petroleum Corporation and Consolidated Subsidiaries, and the report of its independent public accountants.

If you have any questions, or if I can be of further assistance, please do not hesitate to contact me.

Respectfully,

Frank A. Parigi

Enclosures

RECEIVED
APR 01 2020
AWMD / APDB

Occidental Petroleum Corporation

5 Greenway Plaza, Suite 110
Houston, Texas 77046-0521
Phone 713-215-7011 Fax 713-215-7051

Cedric W. Burgher
Senior Vice President and Chief Financial Officer

March 16, 2020

Letter from Chief Financial Officer

U.S. Environmental Protection Agency, Region 7
Attention: Director, Air and Waste Management Division
RCRA Corrective Actions and Permitting Branch
11201 Renner Boulevard (Mail Code AWMD)
Kansas City, Kansas 66219

I am the chief financial officer of Occidental Petroleum Corporation, 5 Greenway Plaza, Suite 110, Houston, Texas 77046. This letter is in support of this firm's use of the financial test to demonstrate financial assurance for closure and/or post-closure costs or corrective action costs, as specified in subpart H of 40 CFR parts 264 and 265.

1. This firm is the owner or operator of the following facilities for which financial assurance for closure or post-closure care or corrective action is demonstrated through the financial test specified in subpart H of 40 CFR parts 264 and 265. The current closure, post-closure and/or corrective action cost estimates covered by the test are shown for each facility:

None

2. This firm guarantees, through the guarantee specified in subpart H of 40 CFR parts 264 and 265, the closure or post-closure care or corrective action of the following facilities owned or operated by the guaranteed party. The current cost estimates for the closure or post-closure care or corrective action so guaranteed are shown for each facility:

FINANCIAL ASSURANCE REQUIRED

FACILITY	TYPE	COST
EPA ID No. KSD007482029 Occidental Chemical Corporation 6200 South Ridge Road Wichita, Kansas 67215	Corrective Action	$4,805,101

The firm identified above is the direct or higher-tier parent corporation of the owner or operator.

3. In States where EPA is not administering the financial requirements of subpart H of 40 CFR part 264 or 265, this firm, as owner or operator or guarantor, is demonstrating financial assurance for the closure or post-closure care or corrective action of the following facilities through the use of a test equivalent or substantially equivalent to the financial test specified in subpart H of 40 CFR parts 264 and 265. The current closure, post-closure and/or corrective action cost estimates covered by such a test are shown for each facility:

FINANCIAL ASSURANCE REQUIRED:

FACILITY		COST
ALD 008 163 388 Mobile, Alabama Plant Site Occidental Chemical Corporation 1300 Jarvis Road Mobile, Alabama 36611	Post-Closure	$912,775
ALD 004 019 642 Muscle Shoals, Alabama Plant Site Occidental Chemical Corporation 1000 North Wilson Dam Road Muscle Shoals, Alabama 35661	Post-Closure	$4,745,325
CAD 009 184 508 Occidental Chemical Corporation 16777 Howland Road Lathrop, California 95330	Closure	$2,813,916
DED 003 913 266 Delaware City Plant Site Occidental Chemical Corporation 1657 River Road New Castle, Delaware 19720	Post-Closure	$1,461,645
DED 003 913 266 U.S. EPA Administrative Order on Consent Docket No. RCRA-03-2012-01 Occidental Chemical Corporation 1657 River Road New Castle, Delaware 19720	Corrective Action	$28,439,000
KSD007482029 (KDHE) Occidental Chemical Corporation 6200 South Ridge Road Wichita, Kansas 67215	Closure	$3,239,372
LAD 981 054 075 Civil Action No. 04-2220 Consent Decree Highway 71/72 Refinery Site Bossier City, Louisiana	Corrective Action	$3,000,000
AI 3544 / GD-093-0517 Permit Application P-0084 Occidental Chemical Corporation 7377 Hwy 3214 Convent, Louisiana 70723	Closure	$2,762,247
EPA ID No. LAD 092 681 824 Occidental Chemical Corporation Geismar, Louisiana 70734	Closure Post-Closure Corrective Action	$2,193,207 $463,542 $9,143,509

FINANCIAL ASSURANCE REQUIRED:

FACILITY		COST
AI 1137 / GD-089-1288 Occidental Chemical Corporation 266 Highway 3142 Hahnville, Louisiana 70057		
Permit Application P-0011	Post-Closure	$1,228,180
Permit Application P-0262	Closure	$9,602,259
	Post-Closure	$869,524
Permit Application P-0264	Closure	$2,340,354
	Post-Closure	$745,868
Civil Action No. JH-88-3655 Consent Decree Sand Gravel and Stone Superfund Site Elkton, Maryland	Corrective Action	$93,670
MID 006 014 906 Occidental Chemical Corporation U.S. EPA Administrative Order - Final Remedy Montague, Michigan	Corrective Action	$12,436,692
File No. 79-22878-CE Occidental Chemical Corporation Consent Judgment – State of Michigan Montague, Michigan	Post-Closure	$2,000,000
MSD 004 000 568 Mississippi Department of Environmental Quality Nashville Ferry Brownfield Agreement Site Nashville Ferry Road Columbus, Mississippi 39701	Post-Closure	$377,715
NJ ISRA No. 98439 Occidental Chemical Corporation 1804 River Road Burlington, New Jersey 08016	Corrective Action	$92,140
NJ ISRA No. 44454 OXY USA Inc. Former Levey Ink Plant 27 Stouts Lane South Brunswick Township, New Jersey 08810	Corrective Action	$550,000
U.S. EPA Index No. 11-CERCLA-02-2010-2028 JIS Landfill Superfund Site Middlesex, New Jersey	Corrective Action	$1,062,480
Civil Action No. 2:19-cv-08654-KM-MAH (D.N.J.) U.S. EPA Consent Order Standard Chlorine Chemical Co. Inc. Superfund Site Kearny, New Jersey	Corrective Action	$4,287,538
NYD 980 506 810 102nd Street Superfund Site Niagara Falls, New York 14302	Corrective Action	$1,000,000

FINANCIAL ASSURANCE REQUIRED:

FACILITY		COST
NYD 002 920 312 Hooker Chemical/Ruco Polymer Superfund Site New South Road Hicksville, New York 11801	Corrective Action	$8,500,000
NYD 000 824 482 Niagara Falls, New York Plant Site Occidental Chemical Corporation Buffalo Avenue & 47th Street Niagara Falls, New York 14302	Post-Closure	$35,295,729
OHD 003 913 308 Occidental Chemical Corporation 725 State Road Ashtabula, Ohio 44004	Post-Closure	$10,753,744
OHD 980 614 572 Fields Brook Superfund Site Ashtabula, Ohio 44004	Post-Closure	$80,339
OHD 990 747 859 Kenton, Ohio Plant Site Durez Corporation 13717 State Route 68 South Kenton, Ohio 43326	Post-Closure	$572,895
PAD 002 334 753 Occidental Chemical Superfund Site Occidental Chemical Corporation Armand Hammer Boulevard Pottstown, Pennsylvania 91464	Corrective Action	$20,337,693
IDL 60-0055 Phase I Occidental Chemical Corporation Santa Fe Pike Columbia, Tennessee 38401	Post-Closure	$325,055
IDL 60-0055 Phase III Occidental Chemical Corporation Santa Fe Pike Columbia, Tennessee 38401	Post-Closure	$582,835
IDL 60-0055 VOAP Post-Closure Care 60527 Occidental Chemical Corporation Santa Fe Pike Columbia, Tennessee 38401	Post-Closure	$8,416,937
TN0001890839 Copper Basin Mining District North Potato Creek Watershed Toccoa Street, HWY 68 Copperhill, Tennessee 37317	Post-Closure	$13,900,000

FINANCIAL ASSURANCE REQUIRED:

FACILITY		COST
TN0001890839 Copper Basin Mining District OU3 (Davis Mill Creek) Toccoa Street, HWY 68 Copperhill, Tennessee 37317	Post-Closure	$32,500,000
TN0001890839 Copper Basin Mining District OU5 (Ocoee River) Toccoa Street, HWY 68 Copperhill, Tennessee 37317	Post-Closure	$1,408,877
TXD 981 911 209 Deer Park, Texas Plant Site Oxy Vinyls, LP P.O. Box 500 Deer Park, Texas 77536	Closure	$7,643,155
TXD 982 286 932 Ingleside, Texas Plant Site Occidental Chemical Corporation Highway 361 Gregory, Texas 78359	Closure	$2,422,769
WAD 009 242 314 Tacoma, Washington Plant Site OCC Tacoma, Inc. 605 Alexander Avenue Tacoma, Washington 98421	Corrective Action	$8,854,499
EPA Docket No. 10-97-0011-CERCLA Occidental Site Tacoma, Washington 98421	Corrective Action	$3,500,000
WVD 005 010 277 EPA Docket No. RCRA-03-2013-0217CA Occidental Chemical Corporation 301 DuPont Avenue Belle, West Virginia 25015	Corrective Action	$678,503
	TOTAL:	**$251,633,988**

4. This firm is the owner or operator of the following hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care, is not demonstrated either to the EPA or a State through the financial test or any other financial assurance mechanism specified in Subpart H of 40 CFR Parts 264 and 265 or equivalent or substantially equivalent State mechanisms. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility:

None

5. This firm is the owner or operator[1] of the following UIC facilities for which financial assurance for plugging and abandonment is required under part 144. The current closure cost estimates as required by 40 CFR 144.62 are shown for each facility:

FINANCIAL ASSURANCE REQUIRED

	CLOSURE	POST-CLOSURE	TOTAL
Occidental Chemical Corporation UIC Class I Wells Wichita, Kansas EPA ID No. KSD007482029	$1,319,120	$0	$1,319,120
Occidental Chemical Corporation UIC Class III Wells Wichita, Kansas EPA ID No. KSD007482029	$2,822,698	$0	$2,822,698
Class III UIC Permit No. UIC3NY001 Dale Brine Field (various wells) Occidental Chemical Corporation 14555 Dallas Parkway Dallas, Texas 75254	$573,917	$0	$573,917
		TOTAL:	**$4,715,735**

This firm is required to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

The fiscal year of this firm ends on December 31. The figures for the following items marked with an asterisk are derived from this firm's independently audited, year-end financial statements for the latest completed fiscal year, ended December 31, 2019.

[1] This firm is the guarantor for the owner or operator of the UIC facilities.

ALTERNATIVE II

1.	Sum of current closure and post-closure cost estimates	$261,154,824
2.	Current bond rating of most recent issuance of this firm and name of rating service	Standard & Poor's: BBB Moody's Investors Service: Baa3
3.	Date of issuance of bond	August 6, 2019
4.	Date of maturity of bond	Floating Rate Senior Notes: February 8, 2021 Floating Rate Senior Notes: August 13, 2021 Floating Rate Senior Notes: August 15, 2022 2.600% Senior Notes: August 13, 2021 2.700% Senior Notes: August 15, 2022 2.900% Senior Notes: August 15, 2024 3.200% Senior Notes: August 15, 2026 3.500% Senior Notes: August 15, 2029 4.300% Senior Notes: August 15, 2039 4.400% Senior Notes: August 15, 2049
*5.	Tangible net worth	$33,048,000,000
*6.	Total assets in U.S. (required only if less than 90% of firm's assets are located in the U.S.)	$94,282,000,000

		YES	NO
7.	Is line 5 at least $10 million?	X	
8.	Is line 5 at least 6 times line 1?	X	
*9.	Are at least 90% of firm's assets located in the U.S.? If not, complete line 10.		X
10.	Is line 6 at least 6 times line 1?	X	

I hereby certify that the wording of this letter is identical to the wording specified in 40 CFR 264.151(f) as such regulations were constituted on the date shown immediately below, except for modifications as directed by the EPA.

[Signature] _____

[Name] Cedric W. Burgher

[Title] Senior Vice President & Chief Financial Officer

[Date] March 16, 2020

OCCIDENTAL PETROLEUM CORPORATION CORPORATE SEAL 1986 DELAWARE

CORPORATE GUARANTEE FOR CLOSURE, POST-CLOSURE CARE, OR CORRECTIVE ACTION CARE

Guarantee made this 16th day of March, 2020 by Occidental Petroleum Corporation, a business corporation organized under the laws of the State of Delaware, herein referred to as guarantor. This guarantee is made on behalf of Occidental Chemical Corporation, of 14555 Dallas Parkway, Dallas, TX 75254 which is our subsidiary, to the United States Environmental Protection Agency (EPA).

RECITALS

1. Guarantor meets or exceeds the financial test criteria and agrees to comply with the reporting requirements for guarantors as specified in 40 CFR 264.143(f), 264.145(f), 265.143(e), and 265.145(e).

2. Occidental Chemical Corporation owns or operates the following hazardous waste management facility(ies) covered by this guarantee:

   EPA ID No. KSD007482029 Corrective Action
   Occidental Chemical Corporation
   6200 South Ridge Road
   Wichita, Kansas 67215

3. "Closure plans" and "post-closure plans" as used below refer to the plans maintained as required by subpart G of 40 CFR parts 264 and 265 for the closure and post-closure care of facilities as identified above.

4. For value received from Occidental Chemical Corporation, guarantor guarantees to EPA that in the event Occidental Chemical Corporation fails to perform closure and post-closure care or corrective action of the above facility(ies) in accordance with the closure and post-closure plans and other permit or interim status requirements whenever required to do so, the guarantor shall do so or establish a trust fund as specified in subpart H of 40 CFR part 264 or 265, as applicable, in the name of Occidental Chemical Corporation in the amount of the current closure, post-closure and/or corrective action cost estimates as specified in subpart H of 40 CFR parts 264 and 265.

5. Guarantor agrees that if, at the end of any fiscal year before termination of this guarantee, the guarantor fails to meet the financial test criteria, guarantor shall send within 90 days, by certified mail, notice to the EPA Regional Administrator(s) for the Region(s) in which the facility(ies) is(are) located and to Occidental Chemical Corporation that he intends to provide alternate financial assurance as specified in subpart H of 40 CFR part 264 or 265, as applicable, in the name of Occidental Chemical Corporation. Within 120 days after the end of such fiscal year, the guarantor shall establish such financial assurance unless Occidental Chemical Corporation has done so.

6. The guarantor agrees to notify the EPA Regional Administrator by certified mail, of a voluntary or involuntary proceeding under Title 11 (Bankruptcy), U.S. Code, naming guarantor as debtor, within 10 days after commencement of the proceeding.

7. Guarantor agrees that within 30 days after being notified by an EPA Regional Administrator of a determination that guarantor no longer meets the financial test criteria or that he is disallowed from continuing as a guarantor of closure or post-closure care or corrective action, he shall establish alternate financial assurance, as specified in subpart H of 40 CFR part 264 or 265 as applicable, in the name of Occidental Chemical Corporation unless Occidental Chemical Corporation has done so.

8. Guarantor agrees to remain bound under this guarantee notwithstanding any or all of the following: amendment or modification of the closure or post-closure plan, amendment or modification of the permit, the extension or reduction of the time of performance of closure or post-closure or corrective action, or any other modification or alteration of an obligation of the owner or operator pursuant to 40 CFR part 264 or 265.

9. Guarantor agrees to remain bound under this guarantee for as long as Occidental Chemical Corporation must comply with the applicable financial assurance requirements of subpart H of 40 CFR parts 264 and 265 for the above-listed facilities, except as provided in paragraph 10 of this agreement.

10. Guarantor may terminate this guarantee by sending notice by certified mail to the EPA Regional Administrator(s) for the Region(s) in which the facility(ies) is(are) located and to Occidental Chemical Corporation, provided that this guarantee may not be terminated unless and until Occidental Chemical Corporation obtains, and the EPA Regional Administrator(s) approve(s), alternate closure and/or post-closure care or corrective action coverage complying with 40 CFR 264.100, 264.101, 264.143, 264.145, 265.143, and/or 265.145.

11. Guarantor agrees that if Occidental Chemical Corporation fails to provide alternate financial assurance as specified in subpart H of 40 CFR part 264 or 265, as applicable, and obtain written approval of such assurance from the EPA Regional Administrator(s) within 90 days after a notice of cancellation by the guarantor is received by EPA Regional Administrator(s) from guarantor, guarantor shall provide such alternate financial assurance in the name of Occidental Chemical Corporation.

12. Guarantor expressly waives notice of acceptance of this guarantee by the EPA or by Occidental Chemical Corporation. Guarantor also expressly waives notice of amendments or modifications of the corrective action, closure and/or post-closure plan and of amendments or modifications of the facility permit(s).

I hereby certify that the wording of this guarantee is identical to the wording specified in 40 CFR 264.151(h) as such regulations were constituted on the date first above written, except for modifications as directed by the EPA.

Effective Date: March 16, 2020

[Name of guarantor]: Occidental Petroleum Corporation

[Authorized signature for guarantor]:

[Name of person signing]: Cedric W. Burgher

[Title of person signing] Senior Vice President & Chief Financial Officer

Signature of witness or notary:

OCCIDENTAL PETROLEUM CORPORATION
CORPORATE SEAL 1986
DELAWARE

NOTARY PUBLIC STATE OF TEXAS
CAROL ANN GLENN
Notary Public, State of Texas
Comm. Expires 05-29-2021
Notary ID 10115225

KPMG LLP
811 Main Street
Houston, TX 77002

Independent Accountants' Report on Applying Agreed-Upon Procedures

The Management
Occidental Petroleum Corporation:

We have performed the procedures enumerated below, which were agreed to by management of Occidental Petroleum Corporation and subsidiaries (the Company), the U.S. Environmental Protection Agency and the environmental agencies for the states of Alabama, California, Delaware, Kansas, Louisiana, Mississippi, New York, Ohio, Tennessee, and Washington, solely to assist the specified parties in evaluating the Company's compliance with the U.S. Environmental Protection Agency's financial test to demonstrate financial assurance as of December 31, 2019. The Company's management is responsible for compliance with those requirements. The sufficiency of these procedures is solely the responsibility of the parties specified in this report. Consequently, we make no representation regarding the sufficiency of the procedures enumerated below either for the purpose for which this report has been requested or for any other purpose.

We have obtained the letters dated March 16, 2020 from the Company's Chief Financial Officer to the U.S. Environmental Protection Agency and the environmental agencies for the states of Alabama, California, Delaware, Kansas, Louisiana, Mississippi, New York, Ohio, Tennessee, and Washington. The procedures that we performed and related findings are as follows:

1. Item 5. Tangible net worth – We recomputed the tangible net worth included in item 5 under Alternative II in the letter prepared by the Company by subtracting the dollar amount of intangible assets (obtained from the Company's underlying accounting records as of December 31, 2019 that support the audited consolidated financial statements of the Company) from the dollar amount of total stockholder's equity (obtained from the audited consolidated financial statements of the Company as of December 31, 2019). We compared this amount with the amount disclosed in Alternative II of the letter and found such amounts to be in agreement.

2. Item 6. Total assets in the U.S. – We compared the amount disclosed in Alternative II on the letter to the Company's underlying accounting records of total assets in the U.S. as of December 31, 2019 that support the audited consolidated financial statements of the Company and found such amounts to be in agreement.

3. Item 9. Are at least 90% of the firm's assets located in the U.S.? – We recomputed the percentage of assets located in the U.S. by dividing the amount of assets as of December 31, 2019 in the U.S. (as obtained from the Company's underlying accounting records as described above) by the Company's total consolidated assets (as disclosed in the audited consolidated financial statements of the Company as of December 31, 2019). We compared the result of our calculation to the Company's response disclosed in Alternative II of the letter and found such response to be consistent with our calculation.

This agreed-upon procedures engagement was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants. We were not engaged to and did not conduct an examination or review, the objective of which would be the expression of an opinion or conclusion, respectively, on compliance with the U.S. Environmental Protection Agency's financial test to demonstrate final assurance as of December 31, 2019. Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

KPMG LLP is a Delaware limited liability partnership and the U.S. member firm of the KPMG network of independent member firms affiliated with KPMG International Cooperative ("KPMG International"), a Swiss entity.

This report is intended solely for the information and use of management of Occidental Petroleum Corporation and subsidiaries, the U.S. Environmental Protection Agency and the environmental protection agencies for the states of Alabama, California, Delaware, Kansas, Louisiana, Mississippi, New York, Ohio, Tennessee, and Washington, and is not intended to be and should not be used by anyone other than the specified parties.

KPMG LLP

Houston, Texas
March 16, 2020