

Part II Organizational Action (continued)

17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ▶ See attached

Blank lined area for listing applicable Internal Revenue Code sections.

18 Can any resulting loss be recognized? ▶ See attached

Blank lined area for answering question 18.

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ See attached

Blank lined area for providing other information.

Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct and complete. Declaration of preparer (other than officer) is based on all information of which preparer has any knowledge.

Sign Here Signature ▶ *Michael S. Stutts* Date ▶ Dec. 9, 2014

Print your name ▶ Michael S. Stutts Title ▶ Vice President - Tax

Paid Preparer Use Only	Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN
	Firm's name ▶				Firm's EIN ▶
	Firm's address ▶				Phone no.

Attachment to Form 8937

Report of Organizational Actions Affecting Basis of Securities

Occidental Petroleum Corporation

EIN: 95-4035997

Part II

Item 14: Describe the organizational action and, if applicable, the date of the action or the date against which shareholders' ownership is measured for the action.

Effective November 30, 2014, Occidental Petroleum (OXY) completed a spin-off of at least 80.1 percent of the stock of California Resources Corporation (CRC) into an independent, publicly traded corporation. The spin-off was effectuated by way of a pro rata distribution on November 30, 2014 of at least 80.1 percent of CRC's outstanding common stock to holders of OXY common stock as of the November 17, 2014 record date. Each OXY stockholder received 0.4 shares of CRC common stock for each share of OXY common stock held by such stockholder on the record date. The distribution of the CRC shares was made in book-entry form, which means that no physical share certificates were issued. No fractional shares of CRC common stock were issued. OXY shareholders who otherwise would have been entitled to a fractional share of CRC stock instead received the net cash proceeds of the sale of such fractional share.

Item 15: Describe the quantitative effect of the organizational action on the basis of the security in the hands of the U.S. taxpayer as an adjustment per share or as a percentage of old basis.

For U.S. tax purposes, the allocation of tax basis between shares of OXY common stock and CRC common stock is based on their relative fair market values (FMV) at the time of the distribution. There are several possible methods to determine the FMV of OXY and CRC common stock. Shareholders should consult with their tax advisors. One approach is to use the unadjusted averages of the high and low trading prices of OXY and CRC common stock on the New York Stock Exchange on the first day of regular-way trading after the distribution of CRC common stock.

Item 16: Describe the calculation of the change in basis and the data that supports the calculation, such as the market values of securities and the valuation dates.

The following is an example of the previously-described approach to basis allocation.

The average of the high and low trading prices of OXY and CRC common stock on the New York Stock Exchange on December 1, 2014 were \$78.21 for OXY and \$7.06 for CRC. The pre-distribution tax basis in OXY shares would be allocated 96.515% to OXY shares and 3.485% to CRC shares. See the example below which assumes pre-distribution tax basis of \$75 per share in 99 shares of OXY common stock:

	Number of Shares After Distribution	Average NYSE Trading Price on 12/1/14	Total FMV at 12/1/14	Percentage of Total FMV at 12/1/14	Allocated Tax Basis
OXY Common Stock	99	\$78.21	\$7,742.79	96.515%	\$7,166.24 (96.515% of \$7,425)
CRC Common Stock	39	\$7.06	\$275.34	3.4322%	\$254.84 (3.4322% of \$7,425)
CRC Common Fractional Shares	.600	\$7.06	\$4.24	0.0528%	\$3.92 (0.0528% of \$7,425)
Total			\$8,022.37	100.00%	\$7,425

You are not bound by the approach used in this example, and there may be other reasonable approaches for determining the fair market values for allocating your basis between OXY and CRC common stock. The example provided above is illustrative and is being provided pursuant to Section 6045B of the Code and as a convenience to stockholders and their tax advisors.

Item 17: List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based.

Sections 355(a), 358(a)-(c), 368(a)(1)(D), 1001(a), 1221, 1222, and 1223(1).

Item 18: Can any resulting loss be recognized?

Loss may be recognized for U.S. federal income tax purposes only with respect to cash received in lieu of fractional shares of CRC common stock.

Item 19: Provide any other information necessary to implement the adjustment, such as the reportable tax year.

The spin-off took place on November 30, 2014. Therefore, for calendar year taxpayers, the reportable tax year would be 2014.