

Worksheet
Determination of NEPA Adequacy (DNA)
 U.S. Department of the Interior
 Bureau of Land Management

OFFICE: Winnemucca District, Black Rock Field Office

TRACKING NUMBER: DOI-BLM-NV-W030-2012-0011-DNA

CASEFILE/PROJECT NUMBER: Leases: NVN-75233, NVN-74196
 Unit: NVN-85820X

PROPOSED ACTION TITLE/TYPE: 2012 San Emidio Geothermal Proposed 2
 Observation Wells

LOCATION/LEGAL DESCRIPTION:

Observation Well-11 (OW-11)	T. 29 N., R. 23 E., sec. 4
Observation Well-12 (OW-12)	T. 30 N., R. 23 E., sec. 33, MDM&B

APPLICANT (if any): US Geothermal Nevada, LLC (USGN)

A. Description of the Proposed Action with attached map(s) and any applicable mitigation measures.

U.S. Geothermal LLC (USGN) proposes to construct and drill two observation wells (OW11 & OW12,) with Department of Energy (DOE) funding in order to further evaluate the geothermal resource around their San Emidio Geothermal Facility. The proposed project would improve the data collected regarding optimal location of actual geothermal wells. These wells would be in addition to five observation wells permitted in December 2011 (DNA: DOI-BLM-NV-W030-2011-0200-DNA, Decision Record 12/22/11) and would be in conjunction with six production wells permitted in October 2010 (San Emidio Geothermal Exploration Project Environmental Assessment, DOI-BLM-NV-W030-2010-0006-EA, Decision Record 10/29/10) (San Emidio EA). Well OW11 would be constructed on the existing well pad of well 52-4 (and would not extend outside the disturbance area analyzed for well 52-4). Well OW12 would also be constructed on an existing well pad of well 58-33 (and would not extend outside the disturbance area analyzed for well 58-33). Both well pads and the surrounding area were analyzed in the Wind Mountain Mine Well Environmental Assessment (EA NUMBER: DOI-BLM-NV-020-09-21-EA, March 7, 1989) (Wind Mountain EA) and under seismic line surveys performed for the San Emidio EA. The existing well pads are approximately 100 feet x 150 feet or 0.34 acre.

The proposed observation well drilling operations each would include an 8 foot x 12 foot fenced sump, a modular mud tank and pump, and shaker. They would have existing access roads associated with them and would not require cross country travel.

Nonetheless, the disturbance produced by the construction of each observation well would be no different than that of a Temperature Gradient Hole. The observation well construction activity would be located on BLM land in the southeast corner of township 30 north range 23 east and the northeast corner of township 29 north range 23 east in Washoe County. The proposed sites would be located on leases NVN-74196 and NVN-75233, within the San Emidio Federal Unit NVN-085820X. Total proposed surface disturbance for this project is estimated to be 0.68 acres.

Lease specific environmental protection stipulations from BLM geothermal leases NVN-75233, and NVN-74196 that would apply to this project are attached.

B. Land Use Plan (LUP) Conformance

LUP Name: Sonoma-Gerlach Management Framework Plan (MFP)

Date Approved: 07/09/82

The proposed action is in conformance with the applicable LUP because it is specifically provided for in the following LUP decision: Objective M-5 of the Sonoma-Gerlach MFP which states “Make energy resources available on all public lands and other lands containing federally owned minerals.”

C. Identify applicable National Environmental Policy Act (NEPA) documents and other related documents that cover the proposed action.

List by name, number, and date (DR/FONSI or ROD) all applicable NEPA documents that cover the proposed action.

1. EA NUMBER: DOI-BLM-NV-W030-2010-0006-EA, “San Emidio Geothermal Exploration Project”, Decision Record/Finding of No Significant Impact (DR/FONSI) dated, October 29, 2010.
2. EA NUMBER: DOI-BLM-NV-020-09-21-EA, “The Wind Mountain Project”, dated March 7, 1989.

List by name and date other documentation relevant to the proposed action (e.g., biological assessment, biological opinion, watershed assessment, allotment evaluation, and monitoring report).

- a. Gold Book (BLM/WO/ST-06/021+3071, 4th Edition) 2006.
- b. DNA Number DOI-BLM-NV-W030-2011-200-DNA, “2011 San Emidio Geothermal Proposed 6 Observation Wells”

D. NEPA Adequacy Criteria

1. Is the new proposed action a feature of, or essentially similar to, an alternative analyzed in the existing NEPA documents(s)? Is the project within the same analysis area, or if the project location is different, are the geographic and resource

**conditions sufficiently similar to those analyzed in the existing NEPA document(s)?
If there are differences, can you explain why they are not substantial?**

Yes. The proposed action to install 2 geothermal observation wells is essentially similar to the proposed action analyzed in the San Emidio EA. The proposed wells would be located within the analysis area of the San Emidio EA, therefore the proposed action would be in the same geographic area and affect the same resources as those analyzed in the San Emidio EA.

The proposed action would also be essentially similar to the proposed action analyzed in the Wind Mountain EA. The difference would be that the Wind Mountain EA analyzed the effects of a gold mining project. In this analysis though, the impact of surface wells was analyzed. It is these actual well pads that would be the locations for the construction of the two observation wells in this proposed action.

2. Is the range of alternatives analyzed in the existing NEPA documents(s) appropriate with respect to the new proposed action, given current environmental concerns, interests, and resource values?

Yes. The San Emidio EA analyzed a proposed action and no action alternative for the installation of 6 Exploration Geothermal wells and therefore are appropriate to this proposed action. No current environmental concerns, interests, and resource values have risen since 2010 which the EA did not address. Although management for sage grouse habitat is currently changing due to increased concern for this species, the San Emidio EA analysis regarding sage grouse remains pertinent due to lack of habitat in the area. Based on GIS data, sage grouse Preliminary Priority Habitat or Preliminary General Habitat is 21 miles from this proposed action and would not be affected by the activity on the proposed well sites.

Each seismic survey line had a cultural survey completed along its routes for a width of approximately 100 feet for the analysis of the October 2010 exploration EA.

3. Is the existing analysis valid in light of any new information or circumstances (such as, rangeland health standard assessment, recent endangered species listings, updated lists of BLM-sensitive species)? Can you reasonably conclude that new information and new circumstances would not substantially change the analysis of the new proposed action?

Yes. The analysis in the San Emidio EA remains valid and germane to the action. No additional information, circumstances, or conflicts have been brought forward that would substantially change the analysis of the new proposed action. Updates to the sage grouse guidance being developed since the warranted but precluded status determination would not be applicable to this proposed action due to the lack of habitat.

4. Are the direct, indirect, and cumulative effects that would result from implementation of the new proposed action similar (both quantitatively and qualitatively) to those analyzed in the existing NEPA document?

Yes. The geographic area encompassing the two proposed well pads were analyzed in the San Emidio EA. Direct, indirect and cumulative impacts of the proposed action would be similar to those analyzed in the San Emidio EA except that the San Emidio EA analyzed well pads of 330 feet by 350 feet.

Furthermore, the Wind Mountain Project EA analyzed these well pad locations associated impacts. This proposed action would not increase surface disturbance to these areas or the areas analyzed in the San Emidio EA. Therefore there would be no incremental impacts associated with the proposed observation wells.

5. Are the public involvement and interagency review associated with existing NEPA document(s) adequate for the current proposed action?

Yes, the public involvement and interagency review associated with the San Emidio EA is adequate. A 30 day scoping period beginning in early November 2008 yielded two (2) comments in favor of further developing the San Emidio site.

Issues identified during scoping were incorporated into the planning effort along with discussion with other agencies and BLM staff.

The preliminary EA was made available for a 15 day public comment period via Dear Interested Party Letters and news release. Four comments were received during this comment period. Comments were taken into consideration and applied as necessary to the final FONSI/DR.

E. Persons/Agencies/BLM Staff Consulted

See Attached Section E for Review Signatures and Conclusion

Please Note: Refer to the EA for a complete list of team members participating in the preparation of the original environmental analysis or planning documents.