

**Worksheet**  
**Determination of NEPA Adequacy (DNA)**  
**U.S. Department of the Interior**  
**Bureau of Land Management**  
**March 2014**

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**Project Lead:** Dan Erbes

**Field Office:** Sierra Front Field Office

**Lead Office:** Sierra Front Field Office

**Case File/Project Number:** NVN 084570

**NEPA Number:** DOI-BLM-NV-C020-2014-0014-DNA

**Project Name:** Ann Mason Exploration Plan of Operations Amendment

**Applicant Name:** Entrée Gold (US) Inc.

**Project Location (County, Township/Range/Section[s]):**

Lyon County, Nevada.

T14N, R 24E, in parts of Sections 20, 21, 27, 32, 33, 34 and T13N 24E, in parts of Sections 2, 3, 8, 9, 13, 14, 15, 16, 21, 22, 23, 24, Mount Diablo Base & Meridian.

Is the project located within preliminary priority habitat for sage-grouse?  Yes  No

Is the project located within preliminary general habitat for sage-grouse?  Yes  No

Is the project located within proposed critical habitat for Bi-State sage-grouse?  Yes  No

Is the project located within proposed critical habitat for Webber's Ivesia?  Yes  No

Does the project include new surface disturbing activities?  Yes  No

**A. Describe the Proposed Action and any applicable mitigation measures:**

Entrée Gold Corp has submitted a revision to the Ann Mason Exploration Plan of Operations (Plan Amendment) (N-84570). The revision expands the project area from 2,224 to 2,233 acres and includes an additional 16 exploration drill sites, 10 water monitoring well sites, and one production well site. Drill/well sites would cause 3.41 acres of new surface disturbance; new temporary road construction would cause 7.27 acres of new surface disturbance.

Mitigation measure: where historic properties occur, exclusion zone(s) may be established to ensure that adverse effects do not occur to historic properties during project implementation.

**B. Land Use Plan (LUP) Conformance:**

The Proposed Action is in conformance within the applicable LUP because it is specifically provided for in the following LUP sections:

Carson City Field Office Consolidated Resource Management Plan (CRMP), May 2001. Page MIN-1 states:

- Pursuant to the mining laws, BLM lands are available for mineral entry, location, exploration, and operations which will not cause undue or unnecessary degradation of the public lands.
- Where cumulative surface disturbance of a project area is greater than five acres, a Plan of Operations and a Reclamation Plan are required of the operator. These plans will be reviewed in conjunction with the Nevada Division of Environmental Protection, Bureau of Reclamation and Regulation to ensure that all state permits are obtained and all state regulations are followed. Plans of Operation may be revised to ensure that federal and state regulations are complied with to prevent undue or unnecessary degradation.
- Plans of Operation will require adequate bonding to guarantee that reclamation will be accomplished at mine closure or project completion.
- Reclamation is required of all levels of activity so as not to cause undue and unnecessary degradation.
- All mineral exploration roads on cut and fill slopes will be reclaimed by recontouring unless they are within or part of a pre-1981 mining disturbance.
- All levels of activity, casual use, notice, or plan of operation, will comply with federal and state regulations regarding air quality, water quality, solid wastes, wildlife and its habitat, archaeological and paleontological resources.

**C. Identify applicable National Environmental Policy Act (NEPA) documents and other related documents that cover the Proposed Action:**

Ann Mason Exploration Project Environmental Assessment (EA)  
 DOI-BLM-NV-C020-2010-0002-EA  
 Decision Record signed on January 19, 2010

Ann Mason Exploration Project Class III Cultural Survey Report (2008)  
 Ann Mason Exploration Project Class III Cultural Survey Report (2014)

**D. NEPA Adequacy Criteria**

**1. Is the new Proposed Action a feature of, or essentially similar to, an alternative analyzed in existing NEPA document(s)? If 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 new Proposed Action (Plan Amendment) involves exploration drilling for locatable minerals which is a feature of the existing EA. The Plan Amendment proposes disturbance just outside the analysis area. The amount of disturbance associated with the Plan Amendment would be the same as previously projected in the EA. The Plan Amendment proposes to eliminate roads

and drill holes, and replace them with alternative roads and drill holes in the new area to keep the total disturbance amount minimal.

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

Yes. This Plan Amendment constitutes a feature of the existing EA. The Plan Amendment lies just outside the same project area and the area of disturbance has not significantly risen. Hence, the range of alternatives analyzed in the existing NEPA document should still be valid.

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

Yes. The BLM has accepted the cultural resources survey completed on the expanded project area and completed a field visit to this area to discuss proposed exploration with a designated representative of the Yerington Paiute Tribe on May 27, 2011. The representative stated that this exploration area is not an area of tribal concern. The cultural resources survey for the expanded project identified on potentially eligible site near one of the proposed access routes. Otherwise, no new information or circumstances have arisen from these surveys and consultations since the original NEPA document was completed. As with the previously approved Plan of Operations, Entrée Gold Corp will exercise avoidance of eligible cultural resources. Hence, it was determined that the impacts associated with the Proposed Action would be non-significant and this Plan Amendment would not require a revision of the existing EA.

**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(s)?**

Yes. This Plan Amendment proposes to expand the project area boundary outside the already approved area, but would result in the same amount or less total disturbance, and constitute the same type of activity (construction of drill roads and pads). Therefore, the direct, indirect, and cumulative impacts would be similar.

**5. Are the public involvement and interagency review associated with the existing NEPA document(s) adequate for the new Proposed Action?**

Yes. This Plan Amendment is a feature of the Proposed Action approved in the existing EA, and the public involvement and interagency review associated with the existing EA/FONSI employed appropriate public and agency reviews. Due to the remote location of the initially Proposed Action, no public scoping or public comment was sought in association with the existing EA. The Nevada Department of Environmental Protection was a coordinating agency in association with preparation of the existing EA.

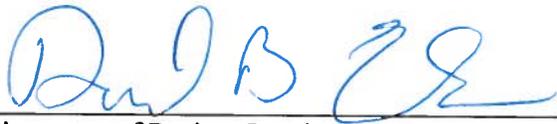
**E. Persons/Agencies/BLM Staff Consulted**

<u>Name</u>	<u>Title</u>	<u>Resource/Agency Represented</u>
Rachel Crews	Archeologist	BLM

Note: refer to the NEPA document(s) for a complete list of team members that participated in the preparation of the original environmental analysis or planning document(s).

Does this DNA constitute the decision document for this Proposed Action?  Yes  No

**Conclusion:** Based on the review documented above, I have concluded that this Proposed Action conforms to the LUP and that existing NEPA document(s) fully cover the Proposed Action and constitutes BLM's compliance with the requirements of the NEPA.



Signature of Project Lead



Signature of NEPA Coordinator



Leon Thomas  
Field Manager  
Sierra Front Field Office

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