

**UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT**

Idaho Falls District
Pocatello Field Office
4350 Cliffs Dr
Pocatello, ID 83204

**CATEGORICAL EXCLUSION REVIEW SHEET
NEPA No. DOI-BLM-ID-I020-2014-0039-CX**

A. Project Description

BLM Office: Pocatello Field Office

Lease/Serial/Case File No: Federal Phosphate Leases I-05975

Proposed Action Title/Type: Rasmussen Valley Exploration Plan Modification

Location of Proposed Action: Caribou County, Idaho. T07S R44E Section 5,6,8,9 Boise Meridian.

History

A total of 144 drill holes with an average depth of 249 feet have been completed in the RV deposit from 1969 to present. Sampling protocol for drilling prior to 2008 did not separate the bedding according to the current modeling requirements. Thus, while useful for guidance in geological interpretations and locations of faults, data from drilling prior to 2008 is not used for interpolating grade values.

An exploration plan was approved in 1999. (FMC South Rasmussen Ridge Exploration Drilling, 1998 Federal Lease I-05975 Environmental Assessment (BLM-ID-030-98-041EA released in April 1999). Subsequently DNAs were completed in 2008, 2010, 2011, and 2012 to expand the exploration. In 2010 an exploration license was granted on the south end of the lease (I-36447). In 2011 a mine and reclamation plan was submitted for the lease. An EIS is currently under way to evaluate the mine and reclamation plan. A decision on the EIS is expected in late 2015.

Description of Exploration Drilling Plan Sequence

The purpose of the proposed exploration drilling in the RV Lease is to provide further delineation and understanding of the Meade Peak Formation phosphatic shales. The proposed exploration drilling activities described below have been deemed necessary to provide a sufficient understanding of the formation rock types, orientation, geometry, and quality prior to any mining activities. Agrium CPO is proposing a total of 136 holes to be drilled in 2014 through 2018. It is anticipated that the drilling will take 2 years to complete; however,

unforeseeable factors could cause it to take longer and a 5-year projection is requested. Drilling will begin when permitted and cease when all holes have been completed and data has been collected. Agrium CPO anticipates drilling activities will not extend beyond the end of the 2018 drilling season. Agrium CPO will present the appropriate drilling data, disturbances, and reclaimed areas to the BLM/USFS and surface land owners in an annual drilling report. This plan includes the re-issuing an exploration license in T. 7S R. 44E section 9. This area was previously covered by an exploration license (I-36447) approved under (DOI-BLM-ID-I020-2012-0063-DNA) , however the license has expired and needs to be reissued. Twelve wells are proposed to be drilled on the exploration license.

Description of Drilling

A total of 136 drill hole locations will be completed on sections ranging from 100 to 200 feet apart. The total cumulative drill hole footage (including core holes) is estimated to be 41,925 feet with an average drill hole depth of 308 feet. Of the 136 drill holes, 8 will be core holes with a cumulative depth of 495 feet and average depth of 62 feet. These core holes will be used to refine the RV geotechnical report (Call & Nicholas, 2011). Four to eight vibrating wire piezometers (VWPs) will be installed in the core holes depending on the drilling results. Attachment 4 presents detailed information about exploration drill hole locations, depths, dips, and bearings.

Number of Acres to be Affected

Table 1 summarizes the approximate estimated acreage of new disturbance needed to complete the exploration drilling project. The total estimated new disturbance for the drill pads is 10.0 acres. The total estimated new disturbance for the drill roads is 9.3 acres. This project will not impact any Idaho Roadless Areas. Figure 1 shows the drill pad and access road locations.

Proposed Estimated Project Disturbance					
Lease	Land	Pad Disturbance (acres)	Access Road New Disturbance (Acres)	Total New Disturbance (Acres)	Access Road Re-disturbance (Acres)
Rasmussen Valley (I-05975)	BLM	1.1	0.8	1.9	0.6
	USFS	5.9	5.7	11.6	1.4
	IF&G	2.1	2.0	4.1	1.4
	Private Land	0.9	0.8	1.7	0.3
Total:		10.0	9.3	19.3	3.7

Table 1: Estimated Project Disturbance

None of the proposed exploration drill holes or access roads are located in wetland areas and no wetlands are expected to be impacted by the exploration drill plan activities. However, if wetlands or other sensitive areas are encountered during drilling activities, impacts to the area will be minimized by using specialized exploration drilling methods. These specialized methods are designed to allow access and drilling while protecting the *in situ* wetland hydrophobic soils.

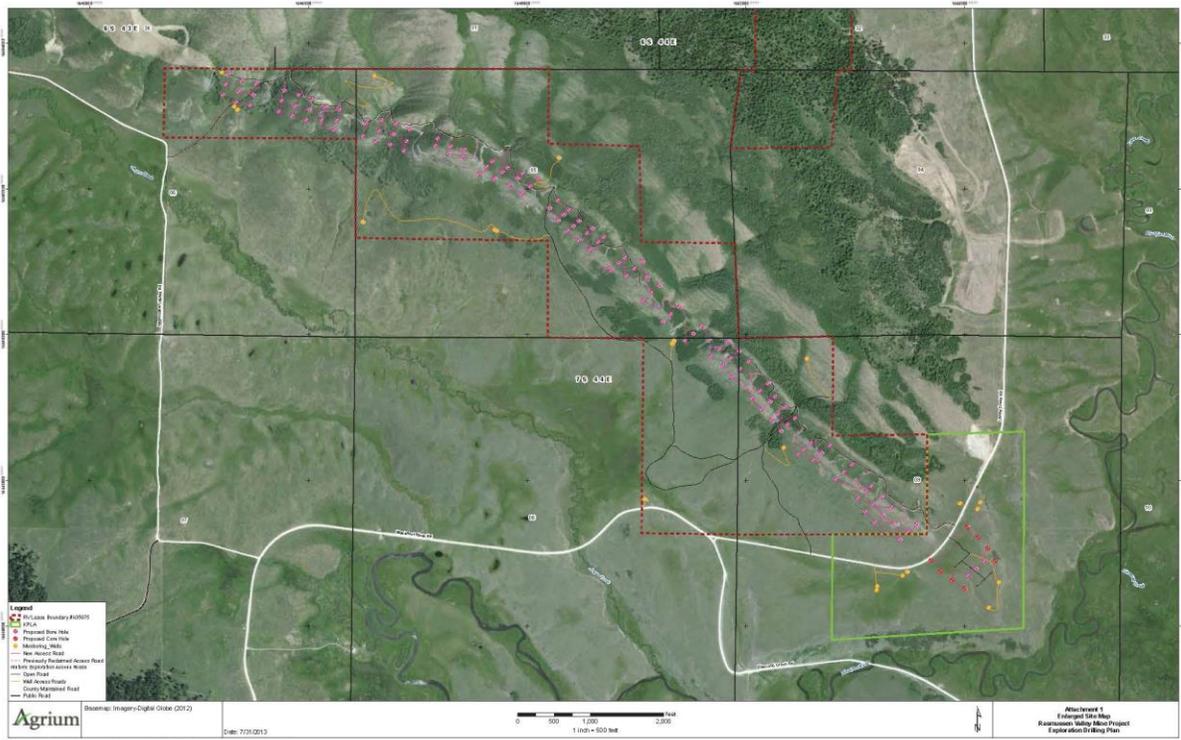


Figure 1: Proposed Rasmussen Valley Exploration Drilling

Potential drilling water will be acquired from two sources. The dust suppression well and water tank adjacent to the RV haul road will provide water for the northern portion of the drilling project. Sheep Creek, at its intersection with the Lanes Creek Road, will provide water for the southern portion of the drilling project. Temporary surface water rights and their associated point of diversion locations will be appropriately permitted with the Idaho Department of Water Resources (IDWR).

Structures associated with this exploration drilling plan will include drill site access roads, drill pads, laydown areas, and drill fluid retention sumps. Existing access roads will be utilized as much as possible to minimize new disturbance. Although existing roads will be

used to the greatest extent possible, Agrium CPO will minimize the number of access points from public roads. Two laydown areas at each end of the project site will be utilized to temporarily store project equipment, tooling, and consumables such as: sediment control best management practices (BMP) materials, drill pipe, drilling materials, hole closure materials, and mobile water storage tanks.

New drill site access roads will be constructed with a dozer and/or excavator utilizing a cut/fill construction method. Disturbance associated with access road construction is estimated using a 30-foot disturbance width per linear foot of road. The exploration drilling plan shows both the existing and proposed access roads. Proposed access roads will be constructed such that road grades are minimized (i.e., less than 10 percent). However, due to the steep topography of the area, road grades may exceed 10 percent for short distances in some areas. It should be noted that existing access roads also have grades greater than 10 percent in certain locations. The roads and drill pads will be constructed from native on-site materials. Agrium CPO does not anticipate importing any road stabilization materials (i.e., road base, gravel, geotextiles, etc.) unless necessitated by unforeseen conditions. Drill site pads will be constructed with a dozer and will be approximately 40 feet by 80 feet. Drill fluid retention sumps will be constructed with a dozer and/or a rubber tire backhoe. The sumps will be located on or near each drill pad in an area that the drilling fluids will flow to. The specific location of each sump will be determined after the drill pad construction is completed.

The total estimated new disturbance for the drill pads is 10.0 acres. The total estimated new disturbance for the drill roads is 9.3 acres. Redisturbance of reclaimed roads total 3.7 acres. This project will not impact any Idaho Roadless Areas.

B. Consideration of Extraordinary Circumstances:

This CER Sheet documents the review of the proposed action to determine if any of the extraordinary circumstances described in 43 Code of Federal Regulations (CFR) 46.215 applies. If any of the extraordinary circumstances apply to the proposed action, then an EA or EIS must be prepared. Any evidence or concerns that one or more of the exceptions may apply must be brought to the attention of the manager who is authorized to approve the proposed action.

1. The proposed action would not have significant impacts on public health or safety

The implementation of the proposed action will not impact public health or safety. The proposed action will result in some truck traffic on roads and some heavy equipment being used in the project area. The recreational use of the area is light and with the use of warning signs and standard safety measures the risk to the public will be minimal.

2. The proposed action would not have significant impacts on such natural resources and unique geographic characteristics as historic or cultural resources; park, recreation or refuge lands; wilderness areas; wild or scenic rivers; national natural landmarks; sole or principal drinking water aquifers; prime farmlands; wetlands (Executive Order 11990);

floodplains (Executive Order 11988); national monuments; migratory birds; and other ecologically significant or critical areas.

The proposed action would occur on BLM, U.S. Fish and Wildlife Service, Idaho Fish and Game, and private lands. There are no known or designated historic or cultural resources, parks, recreation lands, refuges, wilderness areas, wild or scenic rivers, national natural landmarks, national monuments, sole or principal drinking water aquifers, prime farmlands, or any other ecologically significant or environmentally critical areas in the proposed project area. Additionally, no significant impacts would be expected to occur to floodplains or wetlands. Cultural surveys were carried out in 2009 and 2011 that cover the project area. All cultural resources identified in the project area will be avoided and no impact to cultural resources is anticipated. Measures for protecting migratory birds are included in Agrium's proposal and will be incorporated into the conditions of approval. Therefore, impacts to migratory birds will be minimized to the extent possible.

3. The proposed action would not have highly controversial environmental effects or involve unresolved conflicts concerning alternative uses of available resources [NEPA Section 102(2)(E)].

The project (phosphate exploration) is similar to many other projects that have occurred or are occurring in the area and is not highly controversial. The current land use, phosphate mining, is already approved and the proposed action would not change existing resource uses. The area to be impacted is currently undergoing analysis in an environmental impact statement for a proposed mine. Any controversy will likely be directed at the proposed mine and not the exploration.

4. The proposed action would not have highly uncertain and potentially significant environmental effects or involve unique or unknown environmental risks

The proposed action would not have any highly uncertain or potentially significant risk. The proposed exploration is similar to many previous and current exploration projects in the region and the risks and impacts are well understood. There are no location specific factors that would lead to more uncertainty or environmental risk. The area covered by the new exploration license is the same as was covered by the previous exploration license.

5. The proposed action would not establish a precedent for future actions or represent a decision in principle about future actions with potentially significant environmental effects.

No precedent would be established by this project. This project is a standard exploration plan. Similar exploration has occurred at many other locations in the region.

6. The proposed action would not have a direct relationship to other actions with individually insignificant but cumulatively significant environmental effects.

A total of 19.3 acres of new disturbance and 3.7 acre of redistrubence will occur. This is negligent amount of disturbance compared to the proposed mine. The drilling is independant of the the mine plan proposal. This is development drilling and analysis of the mine plan proposal will take place with or without this project. The proposed action will not be cumulative with the proposed mine as the mine disturbance will cover the same area as the exploration. All cumulative impacts from the mine are being analyzed and addressed in the Rasmussen valley EIS.

7. The proposed action would not have significant impacts on properties listed, or eligible for listing, on the National Register of Historic Places as determined by the bureau. Cultural surveys were carried out in 2009 (NWI 2009) and 2011(CRA 2011) that cover the project area. No eligable sites where identified in the project area. All unclassified sites will be avoided and no impact to cultural resources is anticipated.
8. The proposed action would not have significant impacts on species listed, or proposed to be listed, on the List of Endangered or Threatened Species, or have significant impacts on designated critical habitat for these species.

No critical habitat is present in the project area (USFWS IPaC Species list 2014)

Several changes in species status have occurred since the 1999 EA and the 1999 BA were completed for this project, changes in ESA species status and Forest Service sensitive species were initially described in the 2012 DNA. The current list of ESA species that may occur in the project area is described below, the list of Forest Service sensitive species as described in the 2012 DNA remains valid. It is important to note that an updated BA/BE for the exploration project was completed in 2007.

For the purposes of this DNA an updated species list to convey the current presence of ESA listed species potentially occurring in the project areas was requested. According to the most recent USFWS IPaC species list for the project area (dated June 2nd 2014, Consultation tracking #:01EIFW00-2014-SLI-0537) (USFWS IPaC Species list 2014), the following Listed Species may occur in the project area; Bliss Rapids snail (*Taylorconcha serpenticola*), Snake River Physa snail (*Physa natricina*), Canada Lynx (*Lynx canadensis*), and the North American wolverine (*Gulo gulo luscus*).

Bliss Rapids Snail(Endangered) and Snake River Physa snail(Endangered): Neither of these species occur within the project area. The only known occurrences of the Bliss Rapids snail- are in southern Idaho in the Twin Falls area, west to Boise. The Snake River Physa snail is only found in the middle Snake river in Southern Idaho (west of American Falls). Since these species do not occur within the Project Area, there will be *No Effect* to these species.

Canada Lynx(Threatened): The determination of *No Effect*, as described in the 2007 BA remains valid. The drilling of additional wells will not result in effects to Lynx not previously considered.

North American Wolverine (Proposed): As described in the 2012 DNA “Wolverine were initially analyzed as a FS Sensitive species, with a *No Impact* determination. Presence within project area unlikely due to surrounding disturbances and no impacts to denning habitat will occur, *No Impacts* to North American Wolverine are expected.

Forest Service sensitive species: As described in the 2012 DNA, Assuming that all mitigation measures as described in the original EA and the updated BE and Supplemental Information Report (both dated December 6th, 2007) are fully implemented, the determination of effects for FS Sensitive Species in the updated 2007 BE remains appropriate.

The area was thoroughly surveyed in 2012 (TRC 2012). No endangered or threatened species were found.

9. The proposed action would not violate a Federal law, or a State, local, or tribal law or requirement imposed for the protection of the environment.

The proposed action is will not violate any Federal, State, local or tribal laws. All new roads and pads will be surveyed for migratory birds and raptors prior to construction. If found, roads and pads will then be relocated and migratory birds will be avoided.

10. The proposed action would not have a disproportionately high and adverse effect on low income or minority populations (Executive Order 12898).

The project would not have a disproportionally high and adverse impact of low income or minority populations. The project area is rural and has few local residents. Overall, socio-economic benefits and impacts from the project are minimal.

11. The proposed action would not limit access to and ceremonial use of Indian sacred sites on Federal lands by Indian religious practitioners or significantly adversely affect the physical integrity of such sacred sites (Executive Order 13007).

No native americian sacred sites exist on the property. The project would not restrict access to any public roads or lands.

12. The proposed action would not contribute to the introduction, continued existence, or spread of noxious weeds or non-native invasive species known to occur in the area or actions that may promote the introduction, growth, or expansion of the range of such species (Federal Noxious Weed Control Act and Executive Order 13112).

The project would not contribute to the spread of noxious weeds. BMPs to prevent the introduction and spread of noxious weeds are in place as specified in the original exploration plan (EA# ID-030-98-041) as noted below.

“12. Control of noxious weeds on exploration roads, drill pads, trenches and/or other surface areas disturbed during

Exploration activities is required. Use of chemicals shall be in accordance with applicable USFS standards.”

C. Land Use Plan Conformance

There are two Land Use Plans (LUPs) applicable to the proposed action: the *Caribou National Forest Revised Forest Plan* approved February 13, 2003 and the BLM's *Pocatello Resource Management Plan* approved April 4, 2012. The proposed action is in conformance with these LUPs which specifically allow a lessee or designated operator to mine phosphate on a Federal phosphate lease. The proposed action is subject to the same conditions of approval and mitigation measures developed during NEPA review of the exploration plan, and would not change the mitigation measures that are part of the BLM approval documents.

It is typical for an approved exploration plan to be adjusted in order to accommodate new information that affects mining and reclamation. Reclamation and environmental control measures may also need to be adjusted based on new information such as monitoring results. This situation is considered to be standard practice. Exploration plan modifications are codified in Title 43 of the *Code of Federal Regulations*, Part 3506.2, 3590.2 and 3592.1, and are anticipated when BLM conducts NEPA analysis and implements a decision to allow exploration.

D. Compliance with NEPA:

The proposed action is categorically excluded from further documentation under NEPA in accordance with 516 DM, Chapter 11, Section F—Solid Minerals, (7) “Approval of a minor modification to or minor variances from activities described in an approved exploration plan for leasable minerals.”

This CX is appropriate in this situation because there are no extraordinary circumstances potentially having effects that may significantly affect the environment. The proposed action has been reviewed, and none of the extraordinary circumstances described in 516 DM 2 apply.

E. Decision Record / Rationale:

My decision is to approve the proposed Rasmussen Valley Exploration Plan as part of a minor modification to the approved exploration plan for Rasmussen Valley. I have reviewed and assessed the proposal within the intent of the CX described in 516 DM 11.9, Section F—Solid Minerals and have determined that extraordinary circumstances do not exist that would require further NEPA analysis.

Agrium holds the lease issued to them by the Federal government that allows them exclusive rights to mine phosphate reserves within the lease. This decision allows them to exercise those rights subject to adherence to mitigation measures that are part of their lease and also those that are in their approved exploration plan. The proposed action is categorically excluded from further documentation under NEPA.

F. Appeals Information:

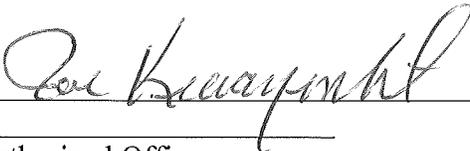
Appeals information can be found at 43 CFR 4.410.

G. Implementation:

I have reviewed the plan conformance statement and have determined that the proposed action is in conformance with the approved land use plan. The activities meet the category of

I have reviewed the plan conformance statement and have determined that the proposed action is in conformance with the approved land use plan. The activities meet the category of actions noted above and I have determined that none of the exceptions apply; therefore, no further environmental documentation is required.

H. Signature

Authorized Officer Date
Joe Kraayenbrink
Idaho Falls District Manager

Contact Person

For additional information concerning this CX review, contact Jeff Cundick, Minerals Branch Chief, at (208) 478-6354.

References

- BLM 1999, Environmental Assessment BLM #ID-030-98-041, FMC South Rasmussen Ridge Exploration Drilling, 1998, Federal lease I-005975 (EA). April 1999.
- BLM 2012, Documentation of Land Use Plan Conformance and NEPA Adequacy (DOI-BLM-ID-I020-2012-0063-DNA). June 19, 2012.
- CRA 2011, Class III Cultural Resource Inventory of the Agrium Rasmussen Valley Mine Project, Caribou County, Idaho. Cultural Resource Analysis Inc. Oct 21, 2011
- NWI 2009, Agrium Mine Expansion, Rasmussen Ridge CRI, Caribou County Idaho. North West Environmental, Sept. 3 2009
- TRC 2012, Final Report 2012 Wildlife Baseline Surveys, Rasmussen Valley Mine Project, Caribou County, Idaho. TRC Environmental Corporation, Oct. 2012
- USFWS IPaC species list 2014, List of threatened and endangered species that may occur in your proposed project location, and/or may be affected by your proposed project. U.S. Fish and Wildlife Service Memo, June 2014