

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

OFFICE Winnemucca District Office, Black Rock Field Office

TRACKING NUMBER: DOI-BLM-NV-W030-2014-0019-DNA

CASEFILE/PROJECT NUMBER: N-92752

FEDERAL GEOTHERMAL LEASE NUMBER: N-42707

PROPOSED ACTION TITLE/TYPE San Emidio DOE Phase 2 Geothermal Exploration Drilling – July 2014

LOCATION/LEGAL DESCRIPTION T.29N., R.23E., Sec.21

APPLICANT (if any): U.S. Geothermal Nevada LLC

A. Description of the Proposed Action with attached map(s) and any applicable mitigation measures. USGN is making application to the Bureau of Land Management's Black Rock Field Office (BLM/BRFO) to drill one (1) geothermal observation well within the San Emidio Geothermal Resource Area requiring less than one (1) acre of new surface disturbance on public land east of the original AMOR II power plant. Recently completed geophysical surveys along with historical temperature gradient data show that a well-defined structural block containing >300°F geothermal fluid occupies roughly one square mile. This structural block remains unexplored below a depth of 500'. There are no fresh water resources in the exploration drilling area.

The proposed exploration well location is based on the results of the geophysical studies that were conducted between 2009 and 2012 under a grant from the Department of Energy (DoE). The proposed well are located on BLM administered public lands leased to USGN under federal geothermal lease N-042707 in Washoe County, Nevada and also located within the San Emidio Unit Agreement N-085820X.

The proposed well are generally located east/northeast of the original Amor II power plant. The well would be located adjacent to existing access roads. No new road building is required and an unimproved drilling area of ¼ acre (75 feet X 150feet) would be located adjacent to an existing road. USG Nevada is not proposing to construct new access roads or an improved well drilling pad. The total estimated area of new surface

disturbance for the project is less than one(<1.0) acre. The observation well will help USGN define the southern extent of the San Emidio geothermal resource. The proposed work does not include geothermal resource utilization or production well drilling.

Applicable Lease Stipulations

There are no stipulations applying to this lease (Lease no. N-42707, dated December 20, 1985).

Mitigating Measures:

All applicable mitigating measures developed in conjunction with the San Emidio Exploration Project EA and Record of Decision would be applied to construction and operation for protection of wildlife and handling of soils and restoration of vegetation as described in sections 6.1.5, pages 36 through 39, of the EA DOI-BLM-NV-W030-2010-0006-EA; DOE/EA-1810; San Emidio Exploration Project. The mitigations are as follows:

6.1.5, page 36-39, General Mitigation and Monitoring:

- This approval is contingent upon the lessee/operator being in receipt of and in compliance with all appropriate state and local permits.
- The lessee/operator must abide by the Lease Terms, Lease Stipulations, Conditions of Approval, and all environmental protection measures and mitigation measures included in the Geothermal Drilling Permits and Operations Plan.
- When cultural or paleontological resources, including but not limited to historic ruins, prehistoric artifacts and fossils, are discovered in the performance of the permit, the resources shall be left intact and immediately brought to the attention of the BLM authorized officer. The operator shall suspend all activities in the vicinity of such discovery until notified to proceed by the authorized officer, and shall protect the site from damage or looting. The authorized officer will evaluate, or will have evaluated, such discoveries as soon as possible but not later than 5 working days after being notified. Appropriate measures to mitigate adverse effects to significant paleontological resources will be determined by the authorized officer after consulting with the operator. The operator is responsible for the cost of any investigation necessary for the evaluation and for any mitigation measures. The operator may not be required to suspend operations if activities can avoid further impacts to a discovered site or be continued elsewhere, however, the discovery shall be brought to the attention of the authorized officer as soon as possible and protected from damage or looting.
- Pursuant to 43 CFR 10.4(g) the holder of this authorization must notify the authorized officer, by telephone, with written confirmation, immediately upon the discovery of human remains, funerary objects, sacred objects, or objects of cultural patrimony (as defined at 43 CFR 10.20). Further, pursuant to 43 CFR 10.4(c) and (d), the lessee/operator shall immediately stop all activities in the

vicinity of the discovery and protect it for 30 days or until notified to proceed by the BLM authorized officer.

- No hazardous materials shall be used during any phase of the operations unless prior approval has been obtained from the BLM authorized officer. All on-site drilling materials and chemicals shall be properly stored to ensure the prevention of spills. No chromate or other heavy metals or environmentally harmful additives will be used.
- No chemicals, fuels, oils, lubricants, or noxious fluids shall be disposed of at the drill sites, in the reserve or flow pits or down the wells.
- If any chemicals, fuels, oils, lubricants, and/or noxious fluids are spilled during drilling operations, they shall be cleaned up immediately. The lessee/operator shall have absorbent on site for spill containment. After clean up, the chemicals, fuels, oil, lubricants and/or noxious fluids and any contaminated material shall be removed from the drill site and disposed of at an approved disposal facility.
- The lessee/operator shall be responsible for all cost associated with any releases of chemicals and/or subsurface fluids resulting from their operations and practices.
- Material Safety Data Sheets for all drilling mud components are to be provided to the Hazmat coordinator at the Winnemucca District Office.
- Portable chemical toilets shall be used for human waste. The human waste shall not be buried on site.
- All equipment and machinery shall be equipped with spark arresters and mufflers.
- The lessee/operator shall be responsible for all suppression costs for any fire resulting from their operations and practices.
- Trash and other debris shall be contained on site and then hauled to an approved landfill. Burial and/or burning on site shall not be permitted.
- Except where otherwise noted, all test equipment, both surface and subsurface, shall be removed at the completion of this drilling and testing, as well as all other debris associated with this exploration.
- For a period of three years following the commencement of construction, project sites shall be inventoried by the lessee for the presences of invasive, nonnative species. Inventory data shall be reported to the BLM BRFO project lead within one week of receipt by the lessee. The area shall be treated with BLM certified pesticides following BLM approval of a pesticide use proposal if species are present.
- Following the three year period, periodic inventory for the presence of invasive nonnative species would be performed at project sites, with treatment occurring as necessary. The periodic inventory and treatment would occur until the BLM determines that final reclamation of the project site is complete and acceptable.
- Roads to be constructed, improved or reclaimed as part of the project would be reviewed by the BLM and required to conform to the requirements of BLM Manual 9 1 13 and the "Gold Book" ("Oil and Gas Surface Operating Standards and Guidelines for Oil and Gas Exploration and Development"), as applicable to the intended project use.
- The reserve pit shall maintain a minimum of two feet of freeboard at all times.

- Where excavation is required, topsoil will be salvaged during construction and stockpiled for use during subsequent reclamation of the disturbed areas.
- Wellhead equipment left on the drill site following the completion of drilling would be painted a color, subject to approval by the authorized officer, which would blend with the landscape. Prior to paint selection, USGN would contact the BLM/BRFO project lead.
- All drill rig and well testing facility lights would be limited to those required to safely conduct the operations, and would be shielded and/or directed in a manner which focuses direct light to the immediate work area.
- If any well will be sitting idle for longer than one year, the well pad shall be scarified and seeded with the recommended seed mix.
- Upon abandonment of the wells, the following shall be done:
 - The wells shall be plugged to comply with all Federal and State of Nevada regulations.
 - All reclamation of disturbed areas shall be completed within one year from the date of proper plugging and abandonment of the well. Any constructed roads, drill pads and reserve pits shall be recontoured to original grade, salvaged topsoil spread on the disturbed area and the site scarified. The disturbed area shall be seeded by hand broadcasting or drilling with the BLM recommended seed mixture (see attached Conditions of Approval). The area shall be raked or dragged to cover the seed if broadcast seeding is used. The BLM Winnemucca Field Office shall be notified in writing when reclamation operations commence and are completed.
 - Seeding of disturbed areas will be completed between October 1 and December 31 using a BLM approved seed mixture and application rate.
- A copy of the Spill or Discharge Contingency Plan must be maintained at the drill site during active operations.

Additional Conditions of Approval (COA) as identified in the following:

- Migratory Bird Treaty Act
- BLM Manual 6840-1
- NV-IM-2011-059 - Updated BLM Sensitive Species List for Nevada
- WO-IM-2013-033P – Fluid Minerals Operations

Migratory Birds: In order to avoid potential impacts to breeding migratory birds, a nest survey shall be conducted by a biologist within potential breeding habitat prior to any surface disturbance proposed during the avian breeding season (March 1st through August 31st). Surveys must be conducted no more than 10 days and no less than 3 days prior to initiation of disturbance. Surveys must follow established BLM standards and protocols, and should be approved by the BLM biologist prior to being implemented. If active nests are located, the BLM biologist must be notified immediately and appropriate protection measures which may include avoidance or restriction of activities will be established. If no active nests are present in the area surveyed, implementation of the project should

commence within 10 days of survey completion. (Migratory Bird Treaty Act) (DOI-BLM-NV-W010-2012-005-EA)

Special Status Plants: A special status plant survey was conducted July 2014 and no special status plants were found within the project area. However, there is still the potential of special status plants within the project area. If a special status plant is located, the BLM must be notified immediately and appropriate mitigation will be established. Appropriate mitigation may include avoidance, seed collection of the target species, or transplanting of target species. The special status plant survey must follow the BLM plant survey protocols and survey results must be sent to the BLM biologist. (BLM Manual 6840-1) (NV-IM 2011-059)

Reclamation: Reseed well pads and areas of overland travel after use using recommended seed mixture (see attached COAs), to get vegetation regrowth in the well pads and areas of overland travel. If a special status species is located within the 250 foot buffer zone around the disturbance areas, reclamation may also include reseeding the areas with the collected seed from the special status plant species. (NV-IM 2011-059)

Wildlife Mortality – General: The operator will notify the Bureau of Land Management (BLM) authorized officer and nearest Fish and Wildlife Service (FWS) Law Enforcement office (916-414-6660) within 24 hours, if the operator discovers a dead or injured federally protected species (i.e., migratory bird species, bald or golden eagle, or species listed by the FWS as threatened or endangered) in or adjacent to a pit, trench tank, exhaust stack or fence. (If the operator is unable to contact the FWS Law Enforcement office, the operator must contact the nearest FWS Ecological Services office (775-861-6300).) (WO-IM-2013-033 P Fluid Minerals Operations)

Exclosure Fencing (Fluid Pits and Open Cellars): The operator will design, construct and maintain exclosure fencing for all open cellars and pits containing freestanding fluids to prevent access to livestock and large forms of wildlife such as deer, elk, and pronghorn. At a minimum, the operator will adequately fence all fluids pits and open cellars during and after drilling operations until the pit is free of fluids and the operator initiates backfilling. The operator will maintain the fence in order to protect public health and safety, wildlife, and livestock. (For examples of exclosure fencing design, refer to the Oil and Gas Gold Book – Exclosure Fence Illustrations, Figure 1, Page 18.) Adequate fencing includes all of the following:

- Construction materials will consist of steel and/or wood posts. Use a fence with a minimum of four separate strands of wires, minimum 42 inches high. The top and bottom strands should be barbed. Use connectors such as fence staples, quick-connect clips, hog rings, hose clamps, twisted wire, etc. Do not use electric fences.
- Set posts firmly in the ground. Stretch the wire, if used, tightly and space it evenly, from the ground level to the top wire, effectively keeping out animals. Construct the fence at least 2 feet from the edge of the pit.

- For reserve pits, fence all four sides as soon as the pit is constructed. Reconstruct any damage to the rig side of the fence immediately following release of the drilling rig.
 - Maintain the erect fences in adequate condition until the pit has been closed. (WO-IM-2013-033, Fluid Minerals Operations)
- **Escape Ramps (Open Pits and Cellars, Tanks, and Trenches):** The operator will construct and maintain pits, cellars, open-top tanks, and trenches, that are not otherwise fenced, screened, or netted, to exclude livestock, wildlife, and humans (for example, lined, clean water pits; well cellars; or utility trenches) to prevent livestock, wildlife, and humans from becoming entrapped (one side of the reserve pit walls will be sloped at a 30% incline). At a minimum, the operator will construct and maintain escape ramps, ladders, or other methods of avian and terrestrial wildlife escape in pits, cellars, open-top tanks, or at frequent intervals along trenches where entrapment hazards may exist. (WO-IM-2013-033, Fluid Minerals Operations)
 - **Exclosure Netting (Open-top Tanks):** Immediately following active drilling or completion operations, the operator will take actions necessary to prevent wildlife and livestock access, including avian wildlife, to all open-topped tanks that contain or have the potential to contain salinity sufficient to cause harm to wildlife or livestock, hydrocarbons, or Resource Conservation and Recovery Act of 1976-exempt hazardous substances. At a minimum, the operator will net, screen, or cover open-topped tanks to exclude wildlife and livestock and prevent mortality. If the operator uses netting, the operator will cover and secure the open portion of the tank to prevent wildlife entry. The operator will net, screen, or cover the tanks until the operator removes the tanks from the location or the tanks no longer contain substances that could be harmful to wildlife or livestock (WO-IM-2013-033, Fluid Minerals Operations).

B. Land Use Plan (LUP) Conformance

LUP Name* Sonoma Gerlach Management Framework Plan Date Approved: 1982

The proposed action is in conformance with the applicable LUP because it is specifically provided for the following LUP decisions as outlined below:

Objective M-5 of the Sonoma-Gerlach MFP states: “Make energy resources available on all public lands and other lands containing federally owned minerals.” The MFP goes on to state under Rationale, “Energy self-sufficiency is a national priority and continues to be top priority of Bureau’s program.” Objective M-5 also states: “The use of clean efficient geothermal energy for both electrical and non-electrical applications will lessen the demand for fossil fuels on local, state, national and international levels.”

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:

DOI-BLM-EA-NV-020-02-38; District Regional Geothermal, Oil and Gas Leasing Environmental Assessment; DR/FONSI dated 08/12/1982; IM No. 84-160 dated 12/14/1983; IM No. 84-160, Change 1, dated 03/26/1984. (The lease pertaining to this project is N-42707, dated December 20, 1985).

DOI-BLM-NV-W030-2010-0006-EA; DOE/EA-1810; San Emidio Exploration Project; DR/FONSI dated 10/29/2010.

DOI-BLM-NV-W010-2010-0004-EA; DOE/EA-1810; New York Canyon Geothermal Exploration Project; DR/FONSI dated 10/15/2010.

DOI-BLM-NV-W010-2012-005-EA; New York Canyon Geothermal Utilization and Interconnect Project; DR/FONSI dated 6/13/2013.

DOI-BLM-NV-W030-2014-0003-DNA; San Emidio DOE Phase 2 Geothermal Exploration Drilling; dated 4/8/2014.

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?

Drill Pads and Sumps for Observation Well Drilling: Yes. The proposed action is similar to the San Emidio Exploration Project EA. The original project was located within Township 29 North, Range 23 East, sections 4, 9 and 16, and Township 30 North, Range 23 East, section 33, to the north of the proposed project area. The proposed action is outside of the project boundary previously analyzed. The geographic and resource conditions of the proposed project area are sufficiently similar to those previously analyzed. The proposed drill pads would result in one acre or less of new disturbance. (see sections 2.1.3-2.17 of the EA DOI-BLM-NV-W030-2010-0006-EA; DOE/EA-1810; San Emidio Exploration Project).

The New York Canyon Geothermal Exploration Project EA DOI-BLM-NV-W010-2010-0004-EA analyzes a Proposed Action and a No Action Alternative with respect to wild horses. The resource conditions of the San Emidio proposed project area are located in similar vegetation types as those described in the New York Canyon Geothermal Exploration Project EA DOI-BLM-NV-W010-2010-0004-EA (Section 3.19). The project area for New York Canyon is salt desert scrub, sagebrush shrub land and pinyon-juniper woodlands at higher elevations and fall within a Herd Management Area (HMA). There is no pinyon-juniper within the current San Emidio project area due to the

proposed project being at lower elevations which would not support the pinyon juniper vegetation type. The analysis for the salt desert scrub and sagebrush shrub land in regards to wild horses from the New York Canyon Geothermal Exploration Project EA DOI-BLM-NV-W010-2010-0004-EA is still applicable.

The New York Canyon Geothermal Exploration Project EA DOI-BLM-NV-W010-2010-0004-EA identifies the use of plant surveys for special status species within the Environmental Protection Measures (pg. 37). New York Canyon Geothermal Exploration Project EA DOI-BLM-NV-W010-2010-0004-EA identifies the use of escape ramps in sumps and fencing around sumps to protect special status species and wildlife in the section 4.1.23.1.1 (pg. 163) and in the Conditions of Approval.

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 alternatives analyzed in the EA's listed in section C are adequate in respect to the proposed action. The alternatives analyzed in the existing documents are appropriate with respect to the current proposed action, as no circumstances or concerns have been identified.

The Proposed Action (Section 2.1) and the No Action (Section 2.2.1) alternatives analyzed in the New York Canyon Geothermal Exploration Project EA DOI-BLM-NV-W010-2010-0004-EA Section are adequate with regards to wild horses.

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, MFP, and other related NEPA documents remain valid and germane to this 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 developed since the warranted but precluded status determination would not be applicable to this proposed action due to the lack of habitat.

The project area is in an area of moderate (PFCY rating 3a) potential for the presence of significant vertebrate fossils, although BLM has no recorded fossil localities within a mile of the project area. Because the drill pads will disturb such a small area and the area that could affect buried fossils is only the diameter of the drill hole, the project is unlikely to affect any significant vertebrate fossils.

Surveys for cultural/historic sites were performed in 2009-2012 for the DoE funded geophysical studies. No historic sites will be impacted.

In April 2010, the U.S. Fish and Wildlife Service (FWS) determined that the Greater Sage-Grouse warranted protection under the Endangered Species Act (ESA), but that listing the species was precluded by the need to address other, higher-priority species first. The FWS Greater Sage-Grouse decision placed the species on the candidate list for future regulatory action. Because of a court-ordered settlement, the FWS has until 2015 to make a final determination on listing the Greater Sage-Grouse under the ESA. BLM has developed draft guidance for the protection of sage-grouse habitats. BLM IM 2012-043 and IM 2012-044 provide guidance on how the BLM is to protect sage grouse habitat.

The 2010 San Emidio EA explains the project area does not contain, nor does it have potential for sage-grouse nesting or brood rearing habitat, and there is potential for winter habitat outside of the project area (pg. 27). Additionally, the 2010 EA explains there is no sage grouse habitat or leks in the project area; there would be no impact to sage-grouse (pg. 31). The current proposed action is not located within Sage Grouse Preliminary Priority or Preliminary General Habitat. Thus the analysis of the greater sage grouse currently remains consistent with that described in the 2010 EA.

The 2010 San Emidio EA discussed that there were no rare plants in the project area, however as of 2011, Sand Cholla is considered a BLM Special Status Plant, (IM NV 2011-059). Three Sand Cholla were found in the 2008 Plant Survey for the 2010 EA. Sand cholla could occur in the proposed project area as they have been found in the vicinity of the project area. Other special status plants have potential to be within the project area, which include Tonopah milkvetch, Pueblo Valley peppergrass, Davis Peppergrass, Nevada Oryctes, and Nevada dune beardtongue. Impacts to special status plants, including Sand cholla were not analyzed in the 2010 EA. The New York Canyon Geothermal Utilization and Interconnect Project EA DOI-BLM-NV-W010-2012-005-EA analyzed Sand Cholla and identified in Section 2.1.11.3 Environmental Protection Measures for Sand Cholla (pg. 37). These measures include a preconstruction survey and avoidance or transplanting if it is not possible to avoid the Sand Cholla.

A survey for special status plants was conducted in July 2014, and no special status plants were found within the project area or within 250 feet of OW-15. A plant survey was not conducted in May and June; therefore, there is still the potential of special status plants within the project area due to the flowering seasons of the special status plants are in May, June, and July. Special Status Plant COAs for this project would mitigate impacts to the sensitive plant species in the event that special status plants are found in the project area. These COAs include plant surveys, and may include appropriate mitigation such as avoidance, transplanting, or seed collection if special status plants are found within the project area.

There is potential for other special status species that were not addressed in the 2010 San Emidio EA, which include: Rice's Blue Butterfly, Pale Kangaroo Mouse, Dark Kangaroo Mouse, and the Humboldt Serican Scarab. The presence of these species would not substantially change the analysis of the new proposed action due to the following EAs

discussing impacts to special status species and wildlife. In the New York Canyon Geothermal Utilization and Interconnect Project EA DOI-BLM-NV-W010-2012-005-EA, Environmental Consequences to Special Status Species were analyzed under the Wildlife section (pages 150, 162 - 166). The New York Canyon 2012 EA (pg. 162) analyzes impacts of temporarily disturbing 142 acres of wildlife habitat and permanently removing 255 acres of wildlife habitat, which include “injury or mortality to smaller, less-mobile species, as well as lizards and small mammals that forage or have burrow complexes within the greasewood and salt desert scrub habitats”. The San Emidio 2010 EA discusses Environmental Consequences to Special Status Species in Section 4.1.10 (pg. 31) for 21 acres of wildlife habitat loss; impacts analyzed include decreased carrying capacity, noise disturbance, and wildlife relocation in project vicinity. Both the New York Canyon 2012 EA and the San Emidio 2010 EA analyze more acres of habitat disturbed, (397 acres and 21 acres, respectively) than the proposed action, which is less than 1 acre of disturbance. The presence of the above mentioned special status species do not substantially change the analysis of the new proposed action due to there being less acres disturbed and the EAs discussing impacts to special status species and wildlife.

On December 13, 2012, Fluid Minerals Operations – Reducing Preventable Causes of Direct Wildlife Mortality IM (WO-IM-2013-033) was finalized. This IM identifies Best Management Practices (BMPs) for reducing the risk of direct wildlife mortality from fluid mineral practices. These BMPs have been applied to this proposed action under “Conditions of Approval”.

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 approaches used in the existing documents are still appropriate to address any possible impacts from this proposed action.

The impacts to wild horses from the San Emidio proposed action are similar to those disclosed in the New York Canyon Geothermal Exploration Project EA DOI-BLM-NV-W010-2010-0004-EA Section 4.20.1. Impacts associated with wild horses would be temporary displacement of wild horses due to construction, human activity and increased noise in the area from construction and drilling. Wild horses would likely return to the area after construction. The impacts would be to a lesser degree than those described in the New York Canyon EA which allowed for up to 15 geothermal observation wells to be drilled and for construction of new roads to access well sites. The proposed action would be up to 4 exploration wells drilled and no new roads would be constructed under the proposed action and therefore the wild horses would not be displaced from as large an area and for a shorter period of time while drilling.

Although the 2010 EA did not specify which sensitive species could be present in the project area, it did analyze impacts of habitat loss and temporary disturbance that could occur to Migratory birds, wildlife species, and special status wildlife species. The 2010 San Emidio EA analyzed up to 21 acres of habitat loss for wildlife and the proposed

project will have approximately 1 acre of habitat loss for wildlife. The direct, indirect, and cumulative effects of the proposed action for wildlife are similar to those analyzed in the 2010 EA.

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 existing NEPA documents was adequate with regards to the complexity of the current proposed action. Public outreach was conducted for the 2010 EA (EA DOI-BLM-NV-W030-2010-0006-EA; DOE/EA-1810; San Emidio Exploration Project). Public scoping was conducted through mailing to interested individuals and advertisement in the local newspaper for 30 day period ending November 30, 2008. Also consulted were Native American tribes including the Susanville Indian Rancheria, Reno-Sparks Indian Colony, Pyramid Lake Paiute Tribe, and Summit Lake Paiute Tribe. Other consultation included USFWS, Nevada Fish and Wildlife Office, and Nevada Natural Heritage Project.

On December 20, 2013, a consultation letter was sent to the Summit Lake Paiute Tribe. A consultation meeting occurred on January 18, 2014 with the tribal council of the Summit Lake Paiute Tribe and BLM management. USGN San Emidio was discussed with Tribal council members and a proposed project schedule and outcome were established. Some opposition was noted however, no project specific concerns were raised.

No additional outreach needs are anticipated for the evaluation of this action. The final NEPA documentation will be made available to the general public on the Winnemucca District webpage.

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Winnemucca District Office

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E. Persons/Agencies/BLM Staff Consulted

Name /Title	Resource/Agency Represented	Signature/Date	Comments (Attach if more room is needed)
Mark Hall	Cultural Resources	S\Mark E. Hall 8/7/2014	
Mark Hall	Native American Religious Concerns	S\Mark E. Hall 8/7/2014	
Jim Weiser	Minerals	S\Jim Weiser 8/8/2014	
Kathy Cadigan	General Wildlife Habitat	Vic Lozano, Acting BRFO Field Manager for Kathy Cadigan 8/8/2014	
Kathy Cadigan	T&E Species (Plants & Animals)	Vic Lozano, Acting BRFO Field Manager for Kathy Cadigan 8/8/2014	
Kathy Cadigan	Special Status Species (Plants & Animals)	Vic Lozano, Acting BRFO Field Manager for Kathy Cadigan 8/8/2014	
Zwaantje Rorex	LWC-Lands with Wilderness Characteristics	Zwaantje Rorex 8/7/14	
Mark Hall	NEPA Coordinator	S\Mark E. Hall 8/7/2014	

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

Conclusion (If you found that one or more of these criteria is not met, you will not be able to check this box.)

Based on the review documented above, I conclude that this proposal conforms to the applicable land use plan and that the NEPA documentation fully covers the proposed action and constitutes BLM' compliance with the requirements of the NEPA.

__S\Jim Weiser

8/8/2014_____

Signature of Project Lead

__S\Mark E. Hall 8/7/14_____

Signature of NEPA Coordinator

__S\Vic Lozano 8/8/2014_____

Signature of the Responsible Official

_____ Date

Note: The signed Conclusion on this Worksheet is part of an interim step in the BLM's internal decision process and does not constitute an appealable decision. However, the lease, permit, or other authorization based on this DNA is subject to protest or appeal under 43 CFR Part 4 and the program-specific regulations.