

# Determination of NEPA Adequacy (DNA) Worksheet

U.S. Department of the Interior  
Bureau of Land Management

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STILLWATER FIELD OFFICE: LLNVC01000

TRACKING NUMBER: DOI-BLM-NV-C010-2015-0019-DNA

CASEFILE/PROJECT NUMBER: N30-15-008 GDP, NVN-083931 Geothermal Lease

PROPOSED ACTION TITLE/TYPE: Geothermal Drilling Permit for Injection Well 36-6

LOCATION/LEGAL DESCRIPTION: MDM T. 11 N., R. 33 E., Section 6

APPLICANT (if any): ORNI 37, LLC (Ormat)

## A. Description of Proposed Action and any applicable mitigation measures

ORNI 37, LLC (Ormat) proposes to drill a geothermal injection well as part of their continued development of geothermal resources in the Wild Rose lease in the Gabbs Valley area of Mineral County, Nevada. The proposed location is immediately adjacent to the existing 26-6 well pad. The drilling of the geothermal injection well at this location will require the expansion of the current drill pad (26-6) by approximately 300 ft by 300 ft in order to accommodate drill rig and ancillary equipment. The existing access road to drill pad 26-6 will be used for access to the site and may require some spot maintenance to handle traffic during drilling operations.

## B. Land Use Plan Conformance

LUP Name*	<b>Carson City Field Office Consolidated Resource Management Plan</b>	Date Approved:	<u>May 9, 2001</u>
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*\*List applicable LUPs (for example, resource management plans; activity, project, management, or program plans; or applicable amendments thereto)*

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

MIN-1, Desired Outcomes 1.; Encourage development of energy and mineral resources in a timely manner to meet national, regional, and local needs consistent with the objectives for other public land uses.

MIN-5, Standard Operating Procedures, Leasable Minerals 5.; Oil, gas, and geothermal exploration and production upon BLM land are conducted through leases with the Bureau and are subject to terms and stipulations to comply with all applicable federal and state laws pertaining to various considerations for sanitation, water quality, wildlife, safety, and reclamation. Stipulations may be site specific and are derived from the environmental analysis process.

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

**List by name and date all applicable NEPA documents that cover the proposed action.**

Carson City Field Office – Ormat Nevada Inc., Environmental Assessment Gabbs Valley and Dead Horse Wells Geothermal Exploration Projects, DOI-BLM-NV-C010-2010-0006-EA and FONSI/DR signed January 13, 2010

Stillwater Field Office – Ormat Nevada Inc., Environmental Assessment Wild Rose Geothermal Project, DOI-BLM-NV-C010-2012-0050-EA and FONSI/DR signed October 5, 2012

#### **D. NEPA Adequacy Criteria**

**1. Is the new proposed action a feature of, or essentially similar to, an alternative analyzed in the existing NEPA document(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?**

The proposed action is identical to actions analyzed and within the project area analyzed in both the Gabbs Valley and Dead Horse Wells Geothermal Exploration Projects, DOI-BLM-NV-C010-2010-0006\_EA and FONSI/DR signed 1/13/2010 and Wild Rose Geothermal Project, DOI-BLM-NV-C010-2012-0050-EA FONSI/DR signed 10/5/2012. The proposed area has been culturally cleared. Access to the proposed well location would use existing roads.

**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 value?**

Yes, environmental concerns, interests, and resources have not changed since the completion of the 2010 and 2012 EAs. The range of alternatives in the 2010 and 2012 EAs is still appropriate since the environmental constraints of the geothermal development have not changed.

**3. Is the existing analysis valid in light of any new information or circumstances (such as, rangeland health standard assessments, 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 anticipated impacts to the resources have not changed. Access would be via an existing two-track road and total temporary surface disturbance would be approximately 2 acres.

**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 2010 and 2012 EAs analyzed cumulative impacts on relevant resources. The cumulative impacts to public lands resulting from geothermal development would remain unchanged because the area in question was analyzed for construction of drill pad(s) and/or power plant(s). The proposed action is not different from these previous actions.

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

Yes, the geothermal resource exploration and development operations analyzed in the 2010 and 2012 EAs which describes the public involvement. Consultation with Tribes, other agencies, and interested parties was conducted for the documents

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

**Table . List of Preparers**

Name	Title	Signature
Linda Appel/Chelsy Simerson	Rangeland Management Specialist	<i>[Signature]</i>
Jill Devaurs	Land Law Examiner/ Weed Coordinator	<i>[Signature]</i>
Joel Hartmann/Ken Depaoli	Geologist	<i>[Signature]</i>
Chris Kula	Wildlife Biologist	<i>[Signature]</i>
Angelica Rose	Planning & Environmental Coordinator	<i>[Signature]</i> 5/4/15
Dave Schroeder	Environmental Protection Specialist	<i>[Signature]</i> 5/9/15
Matt Simons	Realty Specialist	<i>[Signature]</i> 5/4/15
Michelle Stropky	Hydrologist	<i>[Signature]</i> 05/4/15
Daniel Westermeyer	Outdoor Recreation Planner	<i>[Signature]</i> 5/4/15
Jason Wright/Kristen Bowen	Archaeologist	<i>[Signature]</i> 5/4/15

**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**

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's compliance with the requirement of NEPA.

*[Signature of Daniel L. Schroeder]*  
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 Signature of Project Lead

*[Signature of Angelica Rose]*  
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 Signature of NEPA Coordinator

*[Signature of Tanya J. Kmetson]*  
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 Signature of the Responsible Official

*[Date: 5/7/2015]*  
 \_\_\_\_\_  
 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 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.



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600

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