

Worksheet

Documentation of Land Use Plan Conformance and NEPA Adequacy DOI-BLM-ID-I020-2015-0028-DNA

U.S. Department of the Interior
Bureau of Land Management (BLM)

A. BLM Office: Pocatello Field Office

Lease/Serial/Case File No. IDI-02, ID-I013738, IDI-014080, IDI-37306

Proposed Action Title/Type: Caldwell Exploration Drilling

Location of Proposed Action: The Project Area is located along Schmid Ridge approximately 13 air miles northeast of Soda Springs, Idaho (see attached maps). The Project Area is accessed via Highway 34 to Blackfoot River Road; then via Slug Creek Road to Caldwell Canyon Road. Specifically, the exploration holes proposed for installation would be located in:

IDI-02:

T.8S., R.43E., B.M., Idaho,

Sec. 12: W1/2 NE 1/4, NE1/4 NW1/4

Sec. 01, Lots 2 and 3, SW1/4 NE1 /4 SE1/4, NW1/4 E1/2 SW 1/4, W1/2 SE1/4

IDI-014080:

T.8S., R.43E., B.M., Idaho,

Sec. 12, E1/2 SE1/4, SE1/4 NE 1/4

Sec. 13, E1/2 SE1/4, E1/2 NE 1/4

Sec. 24, NE 1/4 NE 1/4

IDI-013738:

T.8S., R.44E., B.M., Idaho,

Sec. 19, SE 1/4 NW 1/4, SW 1/4.

Exploration License IDI-37306

T.8S., R.44E., B.M., Idaho,

Sec. 19, SE1/4 NW1/4, SW1/4.

Applicant (if any): P4 Production, LLC (P4)

Description of the Proposed Action:

P4 has submitted a exploration proposal, *2015 Proposed exploration plan for Federal leases IDI-02, 013738, 014080, 37306, and 37319,*

P4 proposes to drill 17 exploratory holes, collect samples for geochemical analysis, and conduct surface mapping activities on its Caldwell Canyon property and adjoining exploration licenses, and prospecting permit areas located in the Caldwell Canyon area beginning approximately July 6. They anticipate this year's work will be completed before September 30.

The primary focus of this year's drill program is to fill-in geology and chemistry information where drill hole spacing is high and to continue evaluating the down-dip extension of the ore body south of Caldwell Canyon. Most of this drilling is planned for Lease IDI-014080. Hole ID's, general locations, depths, and lease numbers are given in Table 1 and the attached geologic map. All exploration activities will be performed in accordance with the EA/ROD conditions of approval issued in May 2013. Approximately 2,474 feet of new access road will be constructed to access 10 drill sites. Six drill sites remain from last year's drill program and will be used this year. Table 2 contains the estimated disturbance to conduct this year's exploration program. The project would result in approximately 1.58 acres of new disturbance.

Each year, following the completion of planned exploration activities, drill pads and roads, which will not be used further, will be reshaped, covered with soil or other available planting media, and planted with an appropriate seed mixture according to the conditions of approval specified in the November 2002 and May 2013 EA and ROD and the wishes of the surface land owner. Roads necessary for access in subsequent years will be cross-ditched to direct water off the roadway and onto adjacent undisturbed ground in accordance with approved Best Management Practices (BMP) and otherwise controlled to limit unauthorized use or access. Other approved BMP's will be utilized to minimize the effects of the proposed action as needed and where appropriate.

P4 proposes to use Major Drilling America, headquartered in Salt Lake City, Utah, to conduct the field work. Additional support equipment will be furnished by A+ Contractors, LLC, of Soda Springs, ID, for the construction of roads, pads, and their reclamation. The equipment planned for use in 2015 are a track mounted RC and core drilling rig, D7 or equivalent dozer for support, a track mounted hoe for reclamation, a water truck and crew pick-ups. To prevent the spread of invasive species, heavy equipment will be thoroughly cleaned before use on the site and small vehicles will be washed on a regular basis. Conventional drilling fluids will be used and activities will be conducted in accordance with the terms and conditions specified in the ROD. Water to be used while drilling will come from temporary water rights on Slug Creek, a tributary of Blackfoot River, or the creek in Caldwell Canyon. The location of the proposed diversions are NW ¼ NW ¼, Section 30, Township 8 South, Range 44 East (Slug Creek)

and NE ¼ NE ¼ Section 13, Township 8 South, Range 44 East (Caldwell Creek) Boise Meridian.

This DNA worksheet is to document NEPA adequacy for the seventeen aforementioned drill holes proposed to be constructed. However, the plan of study submitted by P4 is intended to be dynamic in nature. Consequently, as drilling commences and geologic data becomes available, it may be necessary to:

1. Adjust the locations of the drill holes documented above, and/or
2. Install drill holes on lease.

In the event that either of the conditions listed above would be necessary, this DNA worksheet would also document NEPA adequacy for those scenarios as long as P4 satisfies the requirements and best management practices outlined in the 2013 *Caldwell Canyon Prospecting and Exploration and Trail Creek Exploration Drilling Programs, Environmental Assessment* (DOI-BLM-ID-I020-2013-0002-EA), as well as those conditions of approval documented in the 2013 *Finding of No Significant Impact/Decision Record, Caldwell Canyon Prospecting and Exploration and Trail Creek Exploration Drilling Program*.

Applicant (if any): P4 Production, LLC

B. Conformance with the Land Use Plan (LUP) and Consistency with Related Subordinate Implementation Plans

Pocatello Resource Management Plan, April, 2012

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

The Pocatello Resource Management Plan, April 2012 allows a lessee or designated operator to explore for or mine phosphate on Federal Phosphate Leases, Exploration Licenses, or Prospecting Permits (Pocatello RMP Actions 1.2.3 and 1.2.4).

The Proposed Action or Exploration Plan that was analyzed and approved in the 2013 EA (Section 2.1.1.4) includes the following statement: *Depending on the geologic information obtained from the proposed drilling, it is possible that P4 would request additional exploration drilling above that which was described in the 2012 Exploration Plan. In anticipation of additional requests and to allow for flexibility in the exploration plans, the BLM, for purposes of this assessment, has made an assumption in this analysis that up to double the amount of drill holes proposed in the 2012 Exploration Plan could be drilled if unexpected geologic structures are encountered.*

This statement recognized the potential need for and allows for modifications to the exploration plan. In Addition the EA considered exploration over a number of years. This is the second year of that drilling and as such has been accounted for and analyzed in the original EA.

In summary, the seventeen drill holes to collect geologic information are covered under the original EA and this proposal is consistent with the Land Use Plan, the regulations related to phosphate exploration, the approved Exploration Plan, and the BLM decision.

The proposed action is in conformance with the LUP, even though it is not specifically provided for, because it is clearly consistent with the following LUP decisions (objectives, terms, and conditions) and, if applicable, implementation plan decisions:

Not applicable; see response to previous statement.

C. Identify the applicable NEPA document(s) and other related documents that cover the proposed action.

Caldwell Canyon Prospecting and Exploration and Trail Creek Exploration Drilling Programs, Environmental Assessment #DOI-BLM-ID-I020-2013-0002-EA, June 2013.

Finding of No Significant Impact/Decision Record, Caldwell Canyon Prospecting and Exploration and Trail Creek Exploration Drilling Programs, May 31, 2013.

List by name and date other documentation relevant to the proposed action (e.g., source drinking water assessments, biological assessment, biological opinion, watershed assessment, allotment evaluation, rangeland health standard's assessment and determinations, and monitoring report).

None.

D. NEPA Adequacy Criteria

1. Is the current proposed action substantially the same action (or is a part of that action) as previously analyzed?

Yes.

Documentation of answer and explanation:

The proposed activities are the same as what was analyzed in the EA: drill pad construction, road construction, drilling, reclamation, and implementing standard environmental control measures. The drilling of these 17 drill holes was considered in the original EA.

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

Yes.

Documentation of answer and explanation:

The range of alternatives is still appropriate. The EA analyzed the Proposed Action and a No Action Alternative. The EA also considered, but eliminated, four other alternatives. Neither the action nor the affected area will appreciably change. The proposed

modification of an additional 1.58 acres of disturbance does not present any new circumstances that would merit additional alternatives or would merit an analysis of the eliminated alternatives.

3. Is the existing analysis adequate and are the conclusions adequate in light of any new information or circumstances (including, for example, riparian proper functioning condition [PFC] reports; rangeland health standards assessments; Unified Watershed Assessment categorizations; inventory and monitoring data; most recent Fish and Wildlife Service lists of threatened, endangered, proposed, and candidate species; most recent BLM lists of sensitive species)? Can you reasonably conclude that all new information and all new circumstances are insignificant with regard to analysis of the proposed action?

Yes.

Documentation of answer and explanation:

The existing analysis is adequate and the conclusions in the EA are adequate. The approved Exploration Plan was partially executed in the 2013 drilling season. During that time, no information arose or was identified during inspections that would indicate a change in circumstances on the ground.

The federal status of species evaluated in the 2013 EA has not changed. As stated above, the 2013 EA considered the potential need for additional disturbance within the Project Area. Given that the federal status of species has not changed since completion of the 2013, and given that the 2013 EA anticipated this disturbance and included that disturbance in the impact analysis, the installation of the seventeen drill holes would not change the impact analysis found in the 2013 EA.

The seventeen drill holes are located in Preliminary General Sage-Grouse habitat, but are not located within the 0.6-mile radius of the nearest known lek. Section 3.6.2.1 of the 2013 determined the following impacts to sage-grouse: “*Overall, adverse direct and indirect impacts to the greater sage-grouse are expected to be small. There could be temporary disturbance to sage-grouse from exploration activities outside of the lekking season and a minor amount of preliminary general sage-grouse habitat would be disturbed/removed.*” This impact analysis accounts for the potential doubling of disturbed acres described above and the disturbance from this plan is included in the disturbance considered in the original EA. Consequently, this years disturbance would not change the determinations of effect as described in the 2013 EA.

The seventeen proposed drill holes sites have all been previously surveyed for cultural resources and no eligible sites found. Therefore the conclusion in Section 3.2.2.1, page 3-11, of the EA that there would be no impact to cultural resources is still valid.

4. Do the methodology and analytical approach used in the existing NEPA document(s) continue to be appropriate for the current proposed action?

Yes.

Documentation of answer and explanation:

The analytical methods used in the 2013 EA remain appropriate. As described above, the disturbance associated with this year's drill holes is small (1.58 acres) and has already been analyzed and authorized in the original EA. Because the addition of seventeen new drill holes is within the action that was analyzed, no different types of analysis are warranted.

5. Are the direct and indirect impacts of the current proposed action substantially unchanged from those identified in the existing NEPA document(s)? Does the existing NEPA document sufficiently analyze site-specific impacts related to the current proposed action?

Yes.

Documentation of answer and explanation:

The direct and indirect impacts of the project remain unchanged from the impacts disclosed in the 2013 EA. This year's exploration drilling is small; approximately of 1.58 disturbance acres. The action is the same action that was approved: drill pad construction, drilling, and reclamation. The area, timing, and project will not change. The drill hole locations affect the same resources that were analyzed in the 2013 EA and affect the same resources the same way.

6. Can you conclude without additional analysis or information that the cumulative impacts that would result from implementation of the current proposed action are substantially unchanged from those analyzed in the existing NEPA document(s)?

Yes.

Documentation of answer and explanation:

The 2013 *Finding of No Significant Impact/Decision Record, Caldwell Canyon Prospecting and Exploration and Trail Creek Exploration Drilling Program* determined that there are no significant impacts to the environment from this type of exploration development. Disturbance associated with the proposed drill holes and accompanying drill pads will be no different.

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

Yes.

Documentation of answer and explanation:

There is nothing unique about the proposal that wasn't adequately covered in the original public involvement or interagency review. The public scoping in October 2012 appropriately solicited input from interested and affected individuals, groups, and agencies. Responses were received and compiled into a list of issues that provided a basis for consideration in the Environmental Analysis.

E. Interdisciplinary Analysis: Identify those team members conducting or participating in the preparation of this worksheet.

Name, Title, Resource Represented:

Barry Myers, Geologist, Pocatello Field Office

Jeff Cundick, Minerals Branch Chief, Pocatello Field Office

David Alderman, NEPA Specialist, Pocatello Field Office

F. Mitigation Measures: List any applicable mitigation measures that were identified, analyzed, and approved in relevant LUPs and existing NEPA document(s). List the specific mitigation measures or identify an attachment that includes those specific mitigation measures. Document that these applicable mitigation measures must be incorporated and implemented.

All Mitigation and Monitoring Plans Associated with the 2013 *Caldwell Canyon Prospecting and Exploration and Trail Creek Exploration Drilling Programs, Environmental Assessment* (DOI-BLM-ID-I020-2013-0002-EA) and the associated conditions of approval described in the 2013 *Finding of No Significant Impact/Decision Record, Caldwell Canyon Prospecting and Exploration and Trail Creek Exploration Drilling Program* must be adhered to.

CONCLUSION

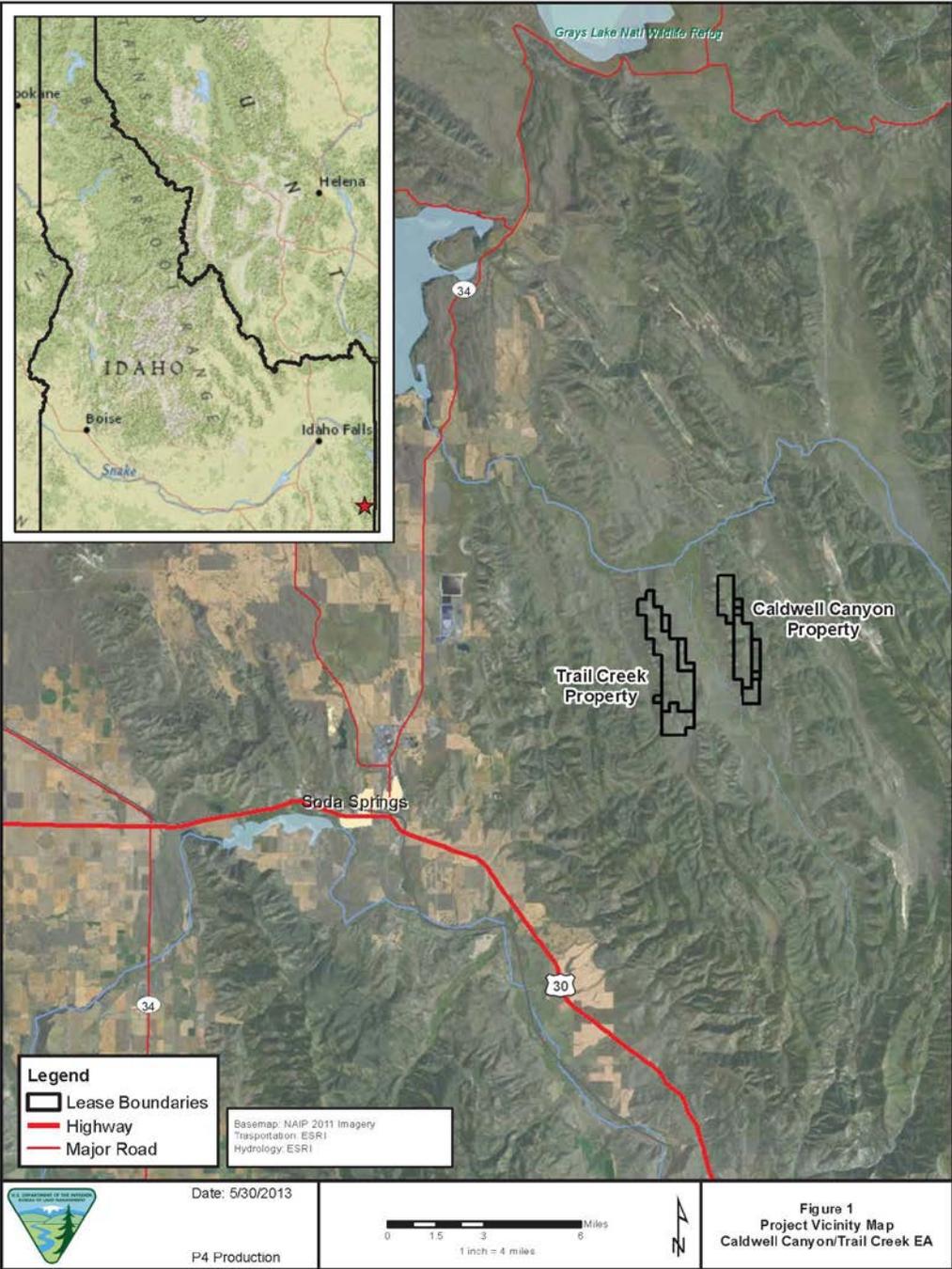
Based on the review documented above, I conclude that this proposal conforms to the applicable land use plan and that the existing NEPA documentation fully covers the proposed action and constitutes BLM's compliance with the requirements of NEPA. Note: If one or more of the criteria are not met, a conclusion of conformance and/or NEPA adequacy cannot be made and this box cannot be checked.

Amid Anderson 6/3/15
(preparer) Date

Jeffrey Paulick 6/3/15
(NEPA reviewer) Date

[Signature]
Signature of the Responsible Official

6/3/15
Date



HOLE-ID	Type	East	North	Elev	Depth	DIP	AZIMUTH	Lease
CC15-046A1	RC	873,106	381,302	6,412	350	50	259	IDI-013738
CC15-046V1	RC	873,106	381,302	6,412	350	90	0	IDI-013738
CC15-066V1	RC	871,592	383,046	6,586	175	90	0	IDI-014080
CC15-086V1	RC	872,395	385,239	6,701	270	75	0	IDI-37319
CC15-092V2	RC	871,732	385,721	6,877	375	90	0	IDI-014080
CC15-096V3	RC	871,518	386,087	6,823	250	90	0	IDI-014080
CC15-096V4	RC	871,914	386,164	6,794	370	90	0	IDI-014080
CC15-104A1	RC	872,025	387,001	6,751	300	70	259	IDI-014080
CC15-112V1	RC	871,780	387,768	6,720	275	70	0	IDI-014080
CC15-132A1	RC	871,088	389,671	6,844	225	90	0	IDI-014080
CC15-058V2	Core	872,652	382,436	6,533	350	0	0	IDI-013738
CC15-084V3	Core	872,151	384,988	6,750	260	90	0	IDI-014080
CC15-100A1	Core	872,069	386,602	6,781	375	65	259	IDI-014080
CC15-104V1	Core	871,578	386,914	6,818	250	90	0	IDI-014080
CC15-108V2	Core	872,024	387,408	6,735	325	70	0	IDI-014080
CC15-124V1	Core	871,664	388,968	6,677	350	50	259	IDI-014080
CC15-136A2	Core	871,708	390,199	6,608	425	70	259	IDI-014080
	Count	17		Total	5,275			

BLM Leases (Public & Private Surface) New Disturbance						
Lease	Length	# of Pads				
IDI-02	0	0				
IDI-013738	765	2				
IDI-014080	1,709	13				
Exploration License (IDI-37306)	0	0				
Propospecting Permit (IDI-37319)	0	1				
Total	2,474	16				
Width	20	20*60	Area	Pad Total	Total	
sq ft	49,480		1,200	19,200	68,680	
Acres	1.14	17 holes		0.44	1.58	

**Figure 1: P4 Production
Caldwell Canyon 2015
Exploration Plan**

