

# Determination of NEPA Adequacy (DNA) Worksheet

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

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## Identifying Information

OFFICE: Stillwater FO, LLNVC01000

TRACKING NUMBER: DOI-BLM-NV-C010-2016-0017-DNA

CASEFILE/PROJECT NUMBER: N30-16-004 GDP Geothermal Lease NVN-90744

PROPOSED ACTION TITLE/TYPE: Ormat Tungsten Mountain Production Well 84A-22 GDP

LOCATION/LEGAL DESCRIPTION: MDM T. 21 N., R. 38 E. Section 22

APPLICANT (if any): Ormat Nevada Inc. (Orni 43 LLC)

## Description of Proposed Action and any applicable mitigation measures

Ormat proposes to conduct a production well drilling programs on lands leased in the Tungsten Mountain Geothermal Project in Edwards Creek Valley, Churchill County, Nevada. The proposed drilling program would: 1) drill a new well to a total depth of approximately 3,200 feet measured depth (MD) or until the geothermal resource is encountered, 2) test the well to determine reservoir characteristics, 3) measure the well's temperature profile and 4) monitor the geothermal reservoir. Preparation for the proposed production well would involve expanding the existing pad for well 84-22 from its current size of 200 feet by 200 feet to an enlarged area of ~400 feet by ~375 feet. Additionally, the existing 200 feet by 80 feet by 7 feet containment basin would be backfilled and a new containment basin - within the footprint of the drill pad - measuring ~300 feet by ~70 feet by ~8 feet would be excavated to contain drilling fluids during drilling and well testing activities. During drilling operations the containment basin would be fenced on the three sides away from the drill rig. At the conclusion of drilling the liquid portion of the contained fluids would be allowed to evaporate prior to back-filling and reclaiming the containment basin. Access to the drill site would use the existing access road which may require minimal spot improvement/maintenance. Water used for site construction, dust control and drilling would be obtained from a private water source near the proposed drill site. The proponent holds valid existing rights for hte project area through various Geothermal Leases and the Tungsten Mountain Geothermal Unit Agreement. The proposed drill site and drilling activities were surveyed and analyzed in the Tungsten Mountain Geothermal Exploration Project EA & FONSI/DR signed March 28, 2012. The Carson City RMP of 2001 has been amended by the Nevada and Northeastern California Greater Sage-Grouse Approved Resource Management Plan Amendment and Record of Decision - September 2015.

**Table 1. Land Use Plan Conformance**

<b>LUP Name*:</b>	Carson City Consolidated Resource Management Plan	<b>Date Approved:</b>	May 9, 2001
<b>Other Document:</b>	Nevada and Northeastern California Sub-Regional Greater Sage-Grouse Land Use Plan Amendment and Record of Decision	<b>Date Approved:</b>	September 21, 2015

\*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 of 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.

See attached list — “Table 1.” — of applicable General and Fluid Mineral specific Required Design Features (RDFs) from the 2015 Record of Decision (ROD).

**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 District — Ormat Nevada, Inc., Tungsten Mountain Geothermal Exploration Project EA and FONSI/ DR signed March 28, 2012.
- ROD and Approved RMP Amendments for the Great Basin Region, Including the Greater Sage-Grouse Sub-Regions of Idaho and Southwestern Montana, Nevada and Northeastern California, Oregon, and Utah signed September 21, 2015.

### **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 the activities and within the project area surveyed and analyzed in the Ormat Nevada, Inc., Tungsten Mountain Geothermal Exploration Project EA and FONSI/DR signed in 2012.

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, even though the environmental concerns, interests and resource values have changed since the completion of the 2012 EA because of the identification of Greater Sage-Grouse habitat, the 2015 EIS analyzes activities that occur in Greater Sage-Grouse habitat. The 2015 EIS includes a set of Required Design Features (RDFs) — listed in Appendix D of that document — for activities occurring in Greater Sage-Grouse habitat. The range of

alternatives in the 2012 Exploration EA and the analysis and applicable RDFs from the 2015 EIS provide an appropriate range of alternatives.

- 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?**

Anticipated impacts to the resources have not changed, however, new information and circumstances have been identified since the signing of the FONSI/Dr in 2012. The 2015 EIS classified the project area as Other Habitat Management Area (OHMA) for Greater Sage-Grouse. The proposed action — pad construction, road maintenance, drilling and well testing — would occur with the project area surveyed and analyzed in the 2012 EA and within OHMA a delineated in the 2015 EIS. The 2015 EIS analyzed activities that would occur in Greater Sage-Grouse OHMA and determined a set of RDFs — listed in Appendix D of that document — for activities occurring the OHMA. The applicable General and Fluid Mineral RDFs would be incorporated into the drilling program for the proposed geothermal well to insure that the proposed action would not have any adverse effect on the environment or human health.

- 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 2012 EA analyzed the cumulative impacts on relevant resources. The cumulative impacts to public lands resulting from geothermal development would remain unchanged. The 2012 EA analyzed cumulative impacts for up to twenty-seven (27) drill sites and wells of which fewer than twelve (12) have been constructed. The proposed action is not different from the construction of well pads, drilling and geothermal reservoir testing analyzed in the 2012 EA. The ROD for the 2015 EIS lists RDFs which have the cumulative effect of conserving, enhancing and restoring Greater Sage-Grouse habitat across the species remaining range in the Great Basin Region.:

- 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 were analyzed in the 2012 EA which describes the public involvement conducted for that document. Consultation with other agencies and interested parties was conducted for that document. The development of the 2015 EIS also provided many opportunities for public involvement.

## Persons/Agencies/BLM Staff Consulted

**Table 2. List of Preparers**

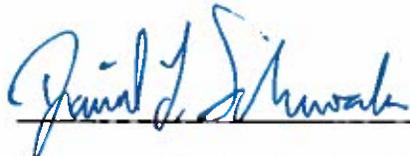
Name	Title	Signature & Date Reviewed
Linda Appel/Chelsy Simerson	Rangeland Management Specialist	la 1/19/2016
	Range Tech/Weed Coordinator	
	Wildlife Biologist	
Dan Westermeyer	Outdoor Recreation Planner	DW 1/19/16
Jason Wright/Kristin Bowen	Archaeologist	JBW 1/19/2016
Angelica Rose	Planning & Environmental Coordinator	AR 1/19/2016
Ken Depaoli/Joel Hartmann	Geologist	Joel Hartmann 1/19/2016
Dave Schroeder	Environmental Protection Specialist	DS 1.19.16
Matt Simons	Lands and Realty	MS 1/19/2016
Michelle Stropky	Hydrologist	MWS 01/19/2016

### Note:

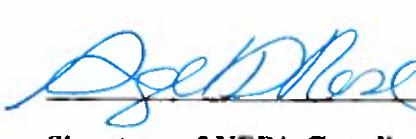
Refer to the EA/EIS for a complete list of the team members participating in the preparation of the original environmental analysis or planning documents.

### 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.

 1.19.16

**Signature of Project Lead and Date**

 1/19/16

**Signature of NEPA Coordinator and Date**

 1/21/2016

**Signature of Responsible Official and Date**

Teresa J. Knutson

Field Manager

Stillwater Field Office

**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.