



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

**Environmental Assessment
September 2025
Copper Mountain Drilling Project Plan of Operations
DOI-BLM-WY-R050-2025-0025-EA**



U.S. Department of the Interior
Bureau of Land Management
Wind River Bighorn Basin District
Lander Field Office
1335 Main Street
Lander, Wyoming 82520

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CHAPTER 1: INTRODUCTION

1.1 Background

Rush Uranium Wyoming LLC. (Rush), currently conducts exploration drilling activities on mining claims under a Surface Management Notice (WYWY106376793), and they propose expanding their operations beyond the five-acre disturbance limit of Notice level operations. Rush submitted a Plan of Operations (Plan) for continued drilling activities on April 4, 2025.

The Plan describes drilling up to 222 exploration holes and constructing associated pads and roads on both private and public lands within 15 different exploration areas totaling approximately 50 acres of disturbance, with up to 37 acres of disturbance occurring on BLM managed public lands. Drilling would be completed with diamond core drills, reverse circulation drills, or standard rotary drills with holes averaging 500 feet deep. All drill holes would be plugged according to State and Federal standards, and reclamation would be concurrent with drilling operations. Drilling would take place over the next two years.

1.2 Purpose and Need

The purpose of this action is to respond to an application for exploration of valuable minerals on mining claims staked under the 1872 Mining Law (as amended) and to ensure the activity does not cause undue or unnecessary degradation of public lands.

The need for the Proposed Action is established by the BLM's responsibility under the Federal Land Policy and Management Act of 1976 (FLPMA), as promulgated through the Surface Management regulations found at Title 43 Code of Federal Regulations (CFR) Part 3809 (43 CFR 3809).

1.3 Decision to be Made

Once the submitted Plan met the standards for completeness per the 43 CFR 3809.401 content standards, the BLM's decision-making is limited to the following:

Determining whether the Plan would or would not result in undue or unnecessary degradation of public lands as defined by the Surface Management Regulations (43 CFR 3809) using the specific performance standards described in 43 CFR 3809.420 as criteria, and then either approve or request modification of the Plan until these standards are met. In addition, the BLM would need to determine whether use and occupancy is reasonably incident to the operations consistent with the regulations as described in 43 CFR 3715.

1.4 Relationship to Statutes and Regulations

Rush submitted the Plan under the 43 CFR 3809 Surface Management regulations. These regulations allow for development of minerals on public lands that are open to mineral entry under the Mining Laws of the United States, as amended. The BLM is required to respond to proposals under the Surface Management regulations and allow for development of locatable minerals if operations prevent undue or unnecessary degradation in accordance with FLPMA. Rush completed drilling in 2024 under a Notice (WYWY106376793) for which no environmental review under the NEPA is required. The BLM and Wyoming Department of Environmental Quality, Land Quality Division (WDEQ-LQD) jointly permit and regulate mining

and exploration activities according to a general statewide Memorandum of Understanding, No. WY 19 signed in 1975 and supplemented in 2003. The WDEQ-LQD permits the proposed activities under a Drilling Notification (DN0497). Other permits the operator will need to obtain prior to operations include the following: Wyoming State Engineer's Office (WSEO) permit for water use, Surface Water Pollution Prevention Plan (SWPPP), Large Construction General Permit with the WDEQ-Water Quality Division (WQD), Pesticide Use Permit (PUP) with the BLM if weeds need to be treated on site.

1.5 Conformance with the Land Use Plan

Land Use Plan Name: Lander Resource Management Plan

Date Approved/Amended: June 26, 2014

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

MR: 1.2 Provide opportunities for mining claimants to explore for and develop locatable minerals.

Full details of the Lander Resource Management Plan can be found at: [Eplanning](#)

The Lander RMP has been reviewed to determine if the proposed action conforms to the land use plan as required by 43 CFR 1610.5-3. The Lander RMP allows for exploration and development of locatable minerals in areas open to mineral entry under the Mining Law, as amended, subject to conditions or mitigation measures as appropriate to prevent undue or unnecessary degradation of public lands.

1.6 Scoping and Issues

1.6.1 Public Involvement

Following the requirements under 43 CFR 3809.5, the project proponent submitted the Plan on April 4, 2025. The BLM reviewed the Plan for completeness per the specific requirements found at 43 CFR 3809.401 and determined the Plan complete April 18, 2025. Once the BLM determined the Plan complete, the Riverton Ranger and Lander Journal published a notice of availability and scoping notice of the Plan on April 26, 2025, for local circulation. The BLM Wyoming State Office published a press release on May 5, 2025. The Riverton Ranger, Lander Journal, K2 Radio, and WyoToday.com published similar articles describing the public scoping period. Responses from eight individuals or organizations were received during the scoping period totaling 55 individual comments. Comments were received from local private landowners inquiring about permissions to the area, several individuals in opposition to the project, the Wyoming Game and Fish Department (WGFD) with comments on wildlife, the Wyoming Outdoor Council (local non-profit group) with various concerns, and the U.S. Environmental Protection Agency (EPA) with various comments. In general, the scoping comments address concerns for wildlife, cultural resources, water resources, riparian/wetlands, grazing, recreation, Tribal consultation, socioeconomics, and air quality.

See the comments document included in the documents section of this project on the BLM ePlanning website for a summary of comments received and BLM responses.

1.6.2 Internal Scoping

The proposed action was reviewed by an interdisciplinary team. Preliminary issues were considered to aid in the development of the proposed action or design features. The interdisciplinary team then determined which issues warranted further consideration by incorporating statutory requirements, supplemental authorities, Department of Interior NEPA guidance, The Lander Field Office Resource Management Plan (2014), and the public scoping comments. Issues and potential impacts related to specific resources associated with the Alternatives were identified.

1.6.3 Issues Identified for Detailed Analysis:

The proposed action was reviewed by an interdisciplinary team. The following issues were identified by the team:

Issue 1: How would the overland travel and construction of drill pads and roads affect native vegetation within the area?

Issue 2: How would water consumption through drilling under the proposed action and alternatives affect water use from the Town of Shoshoni or from other local drainages where water will be utilized?

Issue 3: How would soil disturbance from drilling activities affect occupied habitat of BLM sensitive plant species Owl Creek Miner's Candle?

Issue 4: How would soil disturbance from drilling activities affect occupied habitat of BLM sensitive plant species Porter's Sagebrush?

Issue 5: How would the ground disturbance associate with drill pads and overland travel routes affect wetland/riparian areas?

Issue 6: How would surface and subsurface disturbance from drilling activities affect cultural resources?

CHAPTER 2: ALTERNATIVES

CHAPTER 2. This chapter describes the alternatives that will be analyzed in Chapter 3, and describes alternatives that were considered and why they were eliminated from detailed analysis **Alternative A – No Action Alternative**

The No Action Alternative would deny the Plan of Operations.¹ Under the No Action Alternative, existing land and resource use activities within the project area would generally continue as is. This includes activities limited to exploration using hand tools only, or casual use activities.

¹ The selection of the No Action Alternative would be denying the proponent's right to explore minerals on their mining claims and could result in legal action. Legal action could constitute a taking because it violates existing rights under the Mining Laws. Therefore, the No Action Alternative is included in this EA for analysis purposes only.

2.2 Alternative B – Proposed Action

The Proposed Action is the Plan of Operations application, under case file WYWY106728357, as submitted by the proponent, Rush Uranium Wyoming, LLC (Rush).

The Copper Mountain Drilling Project Plan of Operations describes plans to drill up to 222 drill holes and construct drill pads and associated roads and staging areas totaling up to 50 acres of disturbance with up to 37 acres of disturbance on BLM lands. See Table 2 for tabulated disturbance totals by project area.

The Copper Mountain Drilling Project consists of 15 different project areas proposed for exploration and includes a mixture of BLM managed public lands, State of Wyoming lands, and private lands. Rush has, at time of publishing of this EA, permission from most private landowners and leases from the State, where applicable. This EA assumes Rush will obtain all permissions from surface owners to perform the activities as proposed in the EA prior to initiating activities. This Plan of Operations and EA do not consider for BLM authorization any split-estate lands where surface owner consent has not been granted under the regulations at 43 CFR 3809.31(d) and (e). Table 1 describes the project area names, acres, expected drilling start year, and mineral/surface estate status. **Map 1** shows the location of the project areas.

Table 1: Summary of project areas and ownership

Project Area Name	Surface Estate	Mineral Estate	Project Area Acres (not disturbance)	Expected Start year
Arrowhead	BLM	Federal	69	2025
Canning	BLM	Federal	137	2024 – Notice
Canning Diamond X	Private	Private	320	2024 – Notice
Cedar Ridge	BLM	Federal	134	2026
East Steffen Hill	Private	Federal	401	2026
Fuller	Private	Private	120	2026
Gem	BLM	Federal	50	2025
Hesitation	BLM	Federal	69	2026
Knob	Private	Federal	81	2026
Lucky Cliff	BLM	Federal	180	2025
Mint	BLM	Federal	17	2025
NE Steffen Hill	Private	Federal	200	2026
Railroad	BLM	Federal	39	2026
South Steffen Hill	BLM	Federal	960	2026
Utah	BLM	Federal	5	2026
Total BLM Acres within Project Areas:			1660	
Total Private Acres within Project Areas:			1122	

Roads:

Access to the project area would be via existing roads including some County roads, private roads, and unmaintained two tracks. Some of the existing access roads would require routing maintenance or upgrades, see **Map 1**. Road maintenance would consist of flat blading, rock removal, and application of water for dust control. Road upgrades would consist of grading, rock removal, import of road base material, and temporary culverts, as shown on Map 1. If additional unforeseen road upgrades are required on BLM lands, upgrades would be coordinated with the BLM on a case-by-case basis.

Individual drill pads within project areas would be accessed via temporary access roads that would be constructed between 14 and 20 ft wide depending on slope and terrain (cut/fill) to accommodate drilling equipment to create a 10ft usable running surface. Construction of temporary access roads would consist of stripping and stockpiling topsoil, berms or ditches constructed as necessary to manage stormwater flow. Then these roads would be reclaimed and seeded once drilling is complete.

Drilling:

Drill pads would be constructed approximately 50 ft x 60 ft or 3000 square ft (~0.069 acres) but could vary depending on terrain and constructability of the pad. Rush would construct drill pads contemporaneous with drilling to minimize unnecessary construction. Topsoil would be salvaged and stockpiled separately from subsoil. Sumps, or mud pits, would be constructed at each pad to contain drill cuttings and water. Above ground tanks would be used when sumps cannot be excavated due to bedrock. Sumps would be fenced if left unattended. Once drill holes are plugged, sumps would be backfilled and reclaimed as soon as they are dry.

Drilling methods may include diamond core, reverse circulation, standard rotary, or hammer drilling. Holes would be between 300 ft and 1500 ft deep with an average depth of 500 ft. Drillholes typically range between 4.5 and 6.5 inches in diameter. Drill rigs would be truck mounted, track mounted, or buggy mounted with large tractor-type tires. Drill depths, hole size, rig type, and drilling method would vary by project phase, project area, drilling goals, or contractor availability. Drilling would generally use water, but air drilling would also be possible. When drilling with water, a water truck would be employed to haul water to the drill. Drilling additives such as bentonite, polymers, detergents, or other products could be required depending upon drilling conditions. Drilling water would be acquired from the Town of Shoshoni or a local source if permitted by the Wyoming State Engineer's Office (WSEO). Water tanks would be utilized to store water during drilling and would be located on private or State lands. Water tank storage areas would be reclaimed after drilling.

All drill holes would be plugged according to the Wyoming Environmental Quality act W.S. 35-11-404.

Rush may choose to utilize multiple drill rigs at a time. Besides drill rigs, drilling activities typically include the following equipment:

- 1-2 rubber-tired backhoe loaders for drilling support or road, sump, or pad construction
- 1 medium tracked dozer for road and pad construction
- 1 medium tracked excavator, for road, pad, and sump construction
- 1 motor grader, 12 ft blade, for road maintenance

- 1-2 water trucks, 2,000-to-4,000-gallon capacity, DOT legal highway weight
- 1 tractor trailer water tanker for bulk haulage
- 1-2 portable water storage tanks
- 1 enclosed trailer for parts and tool storage
- 1 flatbed trailer for drilling material storage
- 1 geophysical logging truck, pickup truck
- 2-4 pickup trucks or passenger vehicles
- 1-2 UTVs for infield transportation

All equipment would be staged at active or inactive drill sites, water tank storage areas, or staging areas. Rush anticipates construction of up to four staging areas as shown on Map 1. Staging areas would be constructed similar to pads and reclaimed after drilling operations but would be approximately 100ft x 100ft (0.23 acres) and located on private or State lands.

Rush anticipates initiating drilling under this Plan of Operations once authorized by the BLM and WDEQ-LQD. Rush would begin drilling as early as May 1 where timing restrictions would allow or through a timing restriction exception request submitted to the BLM Lander Field Office. Annually, Rush would stop activities by November 15, including reclamation. Rush would continue drilling under this Plan of Operations in subsequent years until planned drilling activities would be completed or not performed.

Rush would convert up to 5 holes at the Canning project area into monitoring wells to continue testing water levels and quality in the long term. Rush would coordinate locations and permitting of monitoring wells with the BLM, WDEQ-LQD, and WSEO prior to conversion. Monitoring wells would be constructed with a concrete apron and steel cover and bonded for eventual plugging and reclamation; however, the surface around the monitoring wells would be reclaimed.

Table 2: Tabulated Disturbance Totals by Project Area

Project Area Name	Number of Drill Holes	Drill Footage	Pad Area	Improve Existing Roads Acreage	Construct New Temporary Access Road Acreage
Arrowhead	4	2000	0.265	0.567	0.186
Canning	63	31500	4.349	0	2.706
Canning Diamond X	31	15500	2.083	0	2.083
Cedar Ridge	9	4500	0.595	2.079	2.815
East Steffen Hill	13	6500	0.860	0	2.279
Fuller	11	5500	0.728	0	0.315
Gem	12	6000	0.794	1.035	0.980
Hesitation	8	4000	0.132	0	0.681
Knob	15	7500	0.992	0	1.189
Lucky Cliff	6	3000	0.397	2.542	0.630
Mint	4	2000	0.265	0.530	0.893

NE Steffen Hill	14	7000	0.926	0	1.578
Railroad	6	3000	0.397	0	0.135
South Steffen Hill	25	12500	1.653	3.580	7.669
Utah	1	500	0.066	0	0.032
BLM Totals:	138	69000	9.127	10.334	16.729
BLM Grand Total Acres:	36.19				
Private Totals:	84	42000	5.556	0	7.444
Private Grand Total Acres:	13				
Combined Totals:	222	111000	14.683	10.334	24.173
Combined Grand Total Acres:	49.19				

Additional information about the proposed action can be found in the Plan of Operations submitted by Rush and published in [ePlanning](#).

2.2.1 Design Features

This section shows mandatory design features for the project implemented to limit resource degradation or pollution. These features were either submitted by Rush or proposed by the Lander Field Office Interdisciplinary Team and agreed to by Rush as a condition for implementation of the project.

Operator proposed design features:

- Topsoil and subsoil would be segregated. Any topsoil stored over the winter months would be seeded to prevent erosion and soil degradation.
- Sumps would be fenced if left unattended and would be backfilled and reclaimed immediately after drilling.
- Construction and reclamation would occur concurrent with drilling to minimize unnecessary disturbances.
- Rush would obtain and adhere to a Large Construction General Permit and Storm Water Pollution Prevention Plan with the WDEQ-Water Quality Division. These permits require Best Management Practices for stormwater management on disturbed areas such as wattles, berming, water bars, as described in detail in the Plan of Operations.
- Rush would take reasonable measures to prevent or suppress fires around operations.
- Any spilled drilling fluids or leaks from equipment would be cleaned up immediately. Rush would install absorbent matting under any leaky equipment, and any contaminated materials would be removed from the site and disposed of at an approved facility.
- Reseeding would utilize a BLM approved seed mix and rangeland drill where possible, but inaccessible areas would be broadcast seeded and chain dragged with an ATV/UTV. Re-seeding would be done in the fall or early spring if necessary.

- Operations are designed to mostly avoid drainage bottoms with intermittent streams and riparian areas. Any operations within or near riparian areas or streams will take more than ordinary precautions to minimize disturbance, contain sediment, and control drilling fluids. Flagging, fencing, and stormwater/sediment control measures will be applied where appropriate.
- All efforts will be made to avoid the spread of non-native or noxious weeds. All equipment will be pressure washed and cleaned prior to mobilizing to the project. Rush will report any sightings of noxious weeds and obtain appropriate BLM permits if treatment is needed.
- Equipment operators and personnel will be informed of the potential for fossils and cultural resources in the area and instructed to report any findings. Any archaeological or paleontological discoveries made during operations would result in stopped operations and reporting to the BLM.
- Prior to November 15 annually, Rush will complete as much reclamation as possible or stabilize and clean the site in preparation of winter shutdown in accordance with their interim management plan.
- Fall seeding shall be completed after October 1, and prior to ground frost. Spring seeding shall be completed after the frost has left the ground and prior to April 15. This schedule will only be modified if favorable ground conditions exist. Seeding shall be repeated if a satisfactory stand is not obtained.

BLM Required Design Features:

- The holder shall be responsible for prevention and control of noxious weeds and weeds of concern on all areas of surface disturbance associated with the right-of-way. Use of pesticides shall comply with the applicable Federal and State laws. Pesticides shall be used only in accordance with their registered uses and within limitations imposed by the Secretary of Interior. Prior to the use of pesticides on public land, the holder shall obtain from the BLM authorized officer written approval of a plan showing the type and quantity of material to be used, pest(s) to be controlled, method of application, location of storage and disposal of containers, and any other information deemed necessary by the authorized officer to such use.
- Mobile equipment being transported from an offsite location to the Bureau of Land Management project area should be cleaned prior to arrival using water, steam, or air-pressurized cleaning methods to remove any invasive or noxious weed seed and plant parts or materials that could contain seeds or plant parts. When appropriate, identify sites generally off public lands where equipment can be cleaned. Seeds and plant parts need to be collected and disposed of appropriately.
- All mulch, seed and other vegetative reclamation materials must be certified weed free. If available, all sand, gravel, and fill materials shall be certified weed free. Due to the potential to affect significant and sensitive cultural resources, the proponent (and/or any person[s] working on their behalf on federal lands) shall ensure that all surface and subsurface impacts avoid seven (7) defined areas. Geo-referenced PDFs and/or shapefiles (or equivalent file types) which illustrate the precise areas to be avoided shall be provided to the proponent prior to work commencing. Violation of this stipulation may result in the proponent being subject to the penalties and actions contained in the 43 CFR 7 regulations, which are on file at all BLM offices.

- The project operator is responsible for informing all persons associated with this project including employees, contractors, and subcontractors under their direction that they shall be subject to prosecution for damaging, altering, excavating, or removing any vertebrate fossils or other scientifically significant paleontological resources from the project area. Collection of vertebrate fossils (e.g., bones, teeth, turtle shells) or other scientifically significant paleontological resources is prohibited without a permit. Unlawful removal, damage, or vandalism of paleontological resources will be prosecuted by federal law enforcement personnel.
- Any cultural and/or paleontological resources (historic or prehistoric site or object fossil) discovered by the holder, or any person working on his behalf, on public or Federal land shall be immediately reported to the authorized officer. Holder shall suspend all operations in the immediate area of such discovery until written authorization to proceed is issued by the authorized officer. An evaluation of the discovery will be made by the authorized officer to determine appropriate actions to prevent the loss of significant cultural or specific values. The holder will be responsible for the cost of evaluation and any decision as to proper mitigation measures shall be made by the authorized officer after consulting with the holder.
- Consistent with Lander RMP Decision 4071, surface-disturbing and disruptive activities are prohibited within $\frac{3}{4}$ mile of active raptor nests, except ferruginous hawk nests for which surface-disturbing and disruptive activities are prohibited within 1 mile, during the following time periods:
 - February 1 to July 31 for all raptors except northern goshawk and burrowing owl
 - April 1 to August 31 for northern goshawk
 - April 1 to September 15 for burrowing owl
 Distances and dates may vary based on raptor species, chick fledging, topography, and other pertinent factors.
- The project area is within suitable nesting habitat for a variety of migratory birds. Consistent with Lander RMP Decisions 4034 and 4077, Surface disturbing and disruptive activities are prohibited from May 1 – July 15.
- If the proponent desires to operate during the timing restriction, a survey of the proposed disturbance area(s) will be conducted by the proponent to determine the presence/absence of nesting migratory birds no more than 7 days prior to surface disturbing and/or disruptive activities. Survey must be conducted by a qualified wildlife biologist using standardized methods. If the survey locates an active nest or finds signs to indicate that active nest is likely to be present, then surface disturbing and/or disruptive activities would be delayed until chicks have fledged. Nest surveys should include a 10-meter buffer around any area of surface disturbance.
- The project is within crucial winter range for mule deer and pronghorn. Consistent with Lander RMP Decision 4061, Surface disturbance and disruptive activities are prohibited in the project area from November 15 - April 30.
- The Cedar Ridge unit is located outside of Greater Sage-grouse Core Area, but within 2 miles of the Dolus Hill Lek. Consistent with Lander RMP Decision 4105, surface disturbance and disruptive activities are prohibited during the period of March 15 - June 30 in the Cedar Ridge unit for protection of lekking and nesting greater sage-grouse.

2.3 Alternatives Considered but Eliminated from Detailed Analysis

Alternatives to the Proposed Action are limited by the purpose and need for the action of determining whether the Plan submitted prevents undue or unnecessary degradation while not limiting the applicant's rights to explore for valuable mineral deposits on their mining claims. The BLM determined that the applicant-committed environmental protection measures described in the Plan, in addition to the application of appropriate LFO RMP stipulations analyzed in each relevant resources section, are sufficient to reach a determination on undue and unnecessary degradation. Therefore, additional mitigated alternatives are not necessary to reach an informed decision.

CHAPTER 3. Chapter 3: Affected Environment and Environmental Impacts **Affected Environment**

The project areas are in Fremont County in the northern portion of the Wind River Basin of central Wyoming, approximately 15 miles northeast of the town of Shoshoni, Wyoming. Specifically, the proposed project areas are located on the foothills and in steep canyons on the south side of Copper Mountain in the upper portions of Dry Creek, including the West Fork and East Fork of Dry Creek. Dry Creek drains south from the project about 4 miles into Badwater Creek, which drains into the Wind River at Boysen Reservoir 13 miles downstream of Dry Creek. The project is located at elevations from 5400 to 6300 feet above mean sea level, with highest elevations in the northern-most project area. The project areas have seen extensive mining and exploration activities since the 1950's in pursuit of uranium exploration and development. The Rocky Mountain Energy Corp. (RMEC) drilled upwards of 2000 exploration drill holes in the area in the late 1970s and early 1980s. Additionally, the abandoned Arrowhead mine was an underground and surface uranium mine initiated in the 1960s and abandoned in the 1980s and was subsequently reclaimed by the WDEQ-Abandoned Mine Lands Program in 2014. Historic exploration and mining activities in this area have altered the landscape but are reclaimed, naturally revegetated, or in few instances result in barren ground. There are no known quantified or evaluated existing impacts to streams, springs, riparian areas, or wetlands as a result of previous mining and exploration activities. Although Badwater Creek, downstream of the project area is a listed impaired drainage, no streams draining the project area are degraded (on Wyoming's 303d list).

3.2 Issue 1: How would the overland travel and construction of drill pads and roads effect native vegetation within the area?

3.2.1 Affected Environment

Rangeland vegetation in this project area occupies the Shallow Clayey 5-9" Wind River Basin Precipitation Zone, Gravelly 5-9" Wind River Precipitation Zone, and High Plains Southeast Ecological Sites. The total affected area includes 36.19 acres of BLM land. The Rocky Outcrop Ecological Site is within the project area as well, but it does not support a vegetative community.

The Shallow Clayey Wind River Basin Precipitation Zone sites (RO32XY258WY) support a Sagebrush-grassland vegetative community more specifically, mid cool-season perennial grass, forbs and sagebrush. The brush component on this site includes mountain big sagebrush, Wyoming big sagebrush, winterfat, antelope bitterbrush, and rubber rabbit brush. The major

grass components on this site include Griffiths wheatgrass, bluebunch wheatgrass, needleandthread, and Indian ricegrass. Minor grass components within the site includes bottlebrush squirreltail, prairie junegrass, and Sandberg bluegrass.

The Gravelly 5-9 Wind River Precipitation Zone sites (R032XY212WY) support a sagebrush-grassland community more specifically, a mix of warm and cool season mid grasses, forbs and sagebrush. The brush component of the community includes winterfat, big sagebrush, shadscale saltbush, rubber and green rabbitbrush. The major grass components include bluebunch wheatgrass, needleandthread, rhizomatous wheatgrass, and Indian ricegrass. Minor grass components within the community include Sandberg bluegrass, bottlebrush squirreltail, red threeawn, blue grama, and threadleaf sedge.

The Gravelly High Plains Southeast sites (R034AY312WY) support a grassland dominated community with limited shrubs and forb components, more specifically cool season bunchgrasses. This site is relatively low on production potential in all communities. The shrub component of this community includes skunkbush sumac and green rabbitbrush. The major grasses include bluebunch wheatgrass, Indian ricegrass, and needleandthread. Minor grass components include rhizomatous wheatgrass, Sandberg bluegrass, needleleaf sedge, and prairie junegrass.

Similar Ecological sites and vegetation characteristics occur within the entire project area therefore; the full 36.19 acres project is a reasonable analysis area to compare vegetation impacts.

3.2.2 Environmental Effects

This section compares the environmental effects of the alternatives proposed and their relation to Issue 1.

3.2.2.1 *Effects of the Action Alternative*

The Proposed Action would result in 36.19 acres of range vegetation either decreasing in health or removed on public lands through topsoil removal and repeated overland travel. The decreased health or surface disturbance of range vegetation on 36.19 acres would cause a short-term shift in plant communities to an undesirable state, resulting in fewer deep-rooted perennial bunch grasses and more shallow-rooted perennial or annual grasses.

With successful reclamation, a healthy, self-sustaining perennial plant community would be reestablished in the disturbed area. However, it is reasonable to assume from reclamation history, 60% of the disturbed acres would have low potential for reestablishment of desirable plant communities and would need high inputs of reclamation effort. The design features of the project incorporated as part of the proposed action would reduce impact to vegetation and maintain conformance with the LFO RMP requirements.

The Proposed Action would lead to a short term (2-5 years) decrease in vegetation health or removal of vegetation on 36.19 acres, but over the long term (5 or more years), would see that impact repaired to, at a minimum, 60% of the existing condition prior to implementation of the proposed action.

Ultimately, this action would result in impacts to vegetative resources on the 36.19 acres in the project area, though the impact is mitigated by the somewhat disconnected nature of dispersed well pads and drilling sites as well as design features included in the proposed action relating to soil management during implementation and reclamation.

3.2.2.2 *Impacts of No Action Alternative*

Under the No Action alternative, no construction of drill pads or overland travel would occur because of exploratory uranium drilling from Rush. Range vegetation would retain its current status within the project site. There would be no planned disturbances or projects within the 36.19-acre analysis area for vegetation.

3.3 Issue 2: How would water consumption through drilling under the proposed action and alternatives affect water use from the Town of Shoshoni or from other local drainages where water will be utilized?

3.3.1 Affected Environment

The Town of Shoshoni holds permitted water rights through the State Engineer's Office for six wells. These wells range in appropriated use (permitted flow rates) from 50 gallons per minute (gpm) to 280 gpm (WSEO, 2025) totaling approximately 1,425 gpm for all wells. These wells are between 446 and 1,051 ft deep into the Wind River Formation Aquifer. Other water sources that could potentially be utilized through drilling operations include Dry Creek or other unknown wells, or water uses from private lands with varying flow rates and characteristics that may or may not be relevant.

3.3.2 Environmental Impacts

This section compares the environmental effects of the alternatives proposed and their relation to Issue 2.

3.3.2.1 *Impacts of the Action Alternative*

Rush proposes to primarily utilize water from water wells owned by the Town of Shoshoni. Water consumption could total 20,000 gallons per day or approximately 14 gpm for up to 6 months of drilling annually. Actual consumption would vary depending on drilling conditions and drill equipment utilized. However, 14 gpm is a conservative maximum consumption and appropriate for analysis in the EA. This totals approximately 28% of the flow rate from one individual well owned by the Town of Shoshoni with the lowest flow rate and 5% of the highest flow rate well owned by the town of Shoshoni or less than 1% of the total flow rate available to the Town of Shoshoni through all of their water wells. This use would draw-down water in these wells owned by the Town of Shoshoni and could result in decreases in available water from other users. Other potential sources such as Dry Creek could accommodate portions of this use, but likely not all, requiring multiple sources if the Shoshoni wells are not utilized. Any use would require authorization by the WSEO and/or agreement with existing water right holders and/or private landowners. However, water consumption from drilling activities could potentially limit water available to other users at these other potential locations. Because water consumption has potential to impact other water users from either the Town of Shoshoni or other potential water sources, the following Condition of Approval is applied to limit impact. (see Conditions of

Approval document included in the documents section for this project on the BLM ePlanning website).

Condition of Approval 1: If drawdown to water sources is shown to impact other permitted water users, the operator must obtain water from an alternate source permitted by the Wyoming State Engineer's Office.

3.3.2.2 *Impacts of the No Action Alternative*

Water use and consumption under the No Action alternative would not change from existing uses since no water consumption from this drilling project would occur.

3.4 Issue 3: How would soil disturbance from drilling activities affect occupied habitat of BLM sensitive plant species Owl Creek miner's candle?

3.4.1 Affected Environment

Owl Creek miner's candle (*Cryptantha subcapitata*) is a BLM sensitive plant species (BLM 2010). The BLM manages sensitive species in accordance with Manual 6840, which directs the BLM to manage sensitive species in order to prevent their need for listing under the Endangered Species Act. This cushion plant has a global conservation status rank of G1, indicating the species is at very high risk of extinction or elimination due to very restricted range, very few populations or occurrences, very steep declines, very severe threats, or other factors (NatureServe 2025). This long-lived cushion plant is known only from the Owl Creek Mountains and adjacent Wind River Basin in northern Fremont County, Wyoming (WYNDD 2025).

In March of 2021, Wyoming Natural Diversity Database (WYNDD) published an updated Status Report for the Owl Creek miner's candle (Heidel 2021). The Status Report updated the previous 1989 Status Report (Dorn 1989) to include field work conducted by WYNDD in 2019 and 2020. The 2021 Status Report describes an overall decline in occupied habitat of the species from approximately 1,500 acres as reported in the 1989 Status Report (including an additional population found by Walt Fertig in 1997) to approximately 340 acres as of 2019-2020. The status report notes that conditions were not favorable for detection of Owl Creek miner's candle plants in 2019 and 2020 when surveys were conducted. The year 2019 was a cold, wet year, and the WYNDD botanist visited the populations in early June, when flowering rates were very low, so plants were difficult to detect. 2020 saw severe late spring drought conditions, and flowering levels were low both in early June and late June when the WYNDD botanist visited the populations. Despite low detection success, the 2021 Status Report re-mapped the populations as occupying a fraction of the area mapped in the 1989 Status Report (Heidel 2021).

In the years following the 2021 Status Report, BLM conducted surveys in the more optimal conditions present in 2021 and 2022. Surveys in 2021 uncovered hundreds of plants and hundreds of acres occurring outside of the occupied range as depicted in the WYNDD 2021 Status Report. Noting a need for additional survey, BLM in 2022 initiated a larger survey effort to map the extent of the species in the Cedar Ridge area. This survey indicated that there are at least 3,700 acres of occupied habitat of Owl Creek miner's candle in the Cedar Ridge area (BLM 2022). In addition, there were several thousand acres of potentially occupied habitat that was not able to be surveyed but are very likely to contain Owl Creek miner's candle plants due to similarity in habitat. The G1 ranking of Owl Creek miner's candle is due to the 2021 Status

Report indicating substantial declines in occupied habitat since 1989, however, subsequent BLM surveys have shown that this species has not declined and in fact occupies more area than was mapped in 1989. Therefore, the G1 rank overestimates the rarity and vulnerability of Owl Creek miner's candle.

In June of 2025, Real West Consulting surveyed proposed disturbance within potential habitat in areas that had not been previously surveyed by BLM for Owl Creek miner's candle. Those surveys did not uncover any additional occupied habitat in the areas proposed for disturbance (Real West Natural Resource Consulting 2025).

For the purposes of the impact analysis below, the BLM assumes there are 3,700 occupied acres of Owl Creek miner's candle in the Cedar Ridge area. This known occupied habitat is the analysis area for the impact analysis below. This level of occupied acreage is a conservative assumption, because there is additional suitable habitat in the Cedar Ridge region that has not yet been surveyed. In general, Owl Creek miner's candle habitat in the project area is in good condition, dominated by native species appropriate to the ecological site. However, there are scattered areas where the noxious weed cheatgrass is becoming more prevalent.

3.4.2 Environmental Impacts

This section compares the environmental effects of the alternatives proposed and their relation to Issue 3.

3.4.2.1 *Impacts of the Action Alternative*

The large majority of the project is not located within suitable habitat for Owl Creek miner's candle. However, the access road to the Cedar Rim unit is located within occupied Owl Creek miner's candle habitat (BLM 2022). Portions of the proposed access road are on an existing two-track, while other portions are proposed new temporary access roads to be constructed. The existing two-track is infrequently traveled, and Owl Creek miner's candle individuals have been observed growing in the middle of two tracks on Cedar Ridge. Therefore, blading the existing two track as proposed could remove Owl Creek miner's candle plants. For this reason, both construction of new temporary access roads as well as blading of existing access in Owl Creek miner's candle habitat are considered habitat loss in this analysis.

There are approximately 3,200 feet of proposed new and upgraded access roads within occupied Owl Creek miner's candle habitat. At a maximum disturbance width of 20 feet (a conservative assumption because disturbance may vary from 14 feet wide to 20 feet wide, depending on topography), total loss of Owl Creek miner's candle habitat would be approximately 1.47 acres. As stated above in the Affected Environment section, the BLM has mapped approximately 3,700 acres of occupied habitat in the greater Cedar Ridge area. Constructing these roads would lead to a loss of 0.039% of occupied habitat in this subpopulation. Loss of this small amount of occupied habitat would not lead to substantial population declines.

In addition to direct habitat loss, construction of access roads could lead to the introduction and spread of noxious weeds. Noxious weeds can be newly introduced if they are carried on construction equipment. Disturbance of soil associated with construction can also open up

niches where existing noxious weed populations can thrive and spread. Over time, noxious weeds could outcompete Owl Creek miner's candle or make wildfire more frequent.

3.4.2.2 *Impacts of the No Action Alternative*

Under the No Action alternative, there would be no loss of Owl Creek miner's candle habitat, nor would there be new opportunities for the introduction of noxious weeds.

3.5 **Issue 4: How would soil disturbance from drilling activities affect occupied habitat of BLM sensitive plant species Porter's sagebrush?**

3.5.1 Affected Environment

Porter's sagebrush (*Artemisia porteri*) is a BLM sensitive plant species endemic to the Wind River and Powder River Basins in central Wyoming (WYNDD 2025). The most recent Status Report on the species was published by Wyoming Natural Diversity Database in 2002 (Fertig, 2002). The 2002 Status Report states that this species occupies less than 1,250 acres across its range, with approximately 50,000-75,000 individual plants in existence. The species has a Natural Heritage Rank of G3 at a moderate risk of extinction or elimination due to a fairly restricted range, relatively few populations or occurrences, recent and widespread declines, threats, or other factors (NatureServe 2025).

Data from the 2002 Status Report indicate that populations of Porter's sagebrush occur in scattered locations throughout the Cedar Ridge and South Steffen Hill units. Because mapping of Porter's sagebrush was not recent nor high resolution, Real West Consulting surveyed disturbance areas within these two units for the presence of Porter's sagebrush (Real West Natural Resource Consulting 2025). No Porter's sagebrush plants were found in areas proposed to be disturbed, however, four occurrences were documented adjacent to the proposed disturbance.

In general, Porter's sagebrush habitat in this area is in good condition, dominated by native species appropriate to the ecological site. However, there are scattered areas where the noxious weed cheatgrass is becoming more prevalent.

3.5.2 Environmental Impacts

This section compares the environmental effects of the alternatives proposed and their relation to Issue 4.

3.5.2.1 *Impacts of the Action Alternative*

Because no Porter's sagebrush plants were found within the corridor of disturbance, the project will not result in loss of occupied habitat of Porter's sagebrush. However, introduction and spread of noxious weeds could result in degradation of adjacent Porter's sagebrush habitat. Noxious weeds could be introduced if they were carried on construction equipment. In addition, disturbance of soil associated with construction could open up niches where existing noxious weed population could thrive and spread. Over time, noxious weeds could outcompete Porter's sagebrush or make wildfire more frequent.

3.5.2.2 *Impacts of the No Action Alternative*

Under the No Action alternative, there would be no impact to Porter's sagebrush habitat directly as a result of disturbance.

3.6 Issue 5: How would the ground disturbance associate with drill pads and overland travel routes affect wetland/riparian areas?

3.6.1 Affected Environment

The proposed project area is located within 500 feet of wetland/riparian zones identified by United States Fish and Wildlife Service (USFWS) National Wetlands Inventory (NWI). Additionally, there are riparian soils (NRCS, Ecological Site Descriptions) that support adjacent areas with riparian characteristics within the project area.

The riparian soils have not been assessed for their health but currently appear to be functioning and in a healthy state. However, riparian soils within the project area are typically moderately fine to fine textured, and thus susceptible to erosion and head cutting.

3.6.2 Environmental Impacts

This section compares the environmental effects of the alternatives proposed and their relation to Issue 5.

3.6.2.1 *Impacts of the Action Alternative*

The proposed action would result in approximately 1.19 acres of riparian disturbance on public lands from the drill and drill pad locations as well as from road development in riparian areas.

Approximately 17 drill pads and 21 drill holes, resulting in approximately 1.19 acres of BLM managed land, are located within riparian soils. Some temporary access roads, bladed roads, and roads to maintain would be located in and around riparian soils. The road disturbance will average 14 ft wide and could reach up to 20 ft depending on slope and terrain to accommodate cut and fill leveling. Temporary access roads and improved light use roads will be reclaimed in sequence and on a case-by-case basis. Therefore, the proposed action would increase potential for degradation of the riparian soils on this BLM-managed surface until such time as reclamation takes place.

Operations are designed to, where possible, avoid drainage bottoms with intermittent streams where areas with riparian characteristics exist in the project area. Any operations within or near riparian corridors or near intermittent streams will take more than ordinary precautions, as described in operator proposed design features, to minimize disturbance footprints, contain sediment, and control drilling fluids. Flagging, fencing, and stormwater/sediment control measured will all be considered where appropriate.

If reclamation is successful on both roads and drill/drill pad areas, the reclamation effort would establish a self-sustaining perennial plant community that is minimally vulnerable to nick points and head cuts, however, given the known susceptibility of these soils to erosion and the difficulty of revegetation, reclamation may be challenging. Where necessary to prevent unnecessary and

undue degradation and sediment transport from areas of disturbance, sediment control wattles, earth berms, and/or sediment control fence will be installed in accordance with the SWPPP. Water bars will also be placed on access roads as needed to prevent erosion of surface materials. The roads that will be bladed, short term, and maintained are already previously disturbed or will be reclaimed within in 2-4 years with extra precautions put in place around riparian/wetland areas or soils.

3.6.2.2 *Impacts of the No Action Alternative*

Under the No Action alternative, no overland travel or construction of drill pads or site reclamation would occur in riparian areas. Riparian soils would remain intact, and there would be no planned activities that would be cause for riparian area disturbance in the project area.

3.7 Issue 6: How would surface and subsurface disturbance from drilling activities affect cultural resources?

3.7.1 *Affected Environment*

A Class III pedestrian cultural resources inventory was conducted and, as necessary, select sites were subject to limited site testing. This inventory resulted in 22 sites being revisited, as well as 3 new sites and 3 new isolated resources being recorded. National Register of Historic Places (NRHP) evaluations were updated, when necessary, for the 22 previously identified resources, i.e., when their eligibility was previously left unevaluated. Among the 25 sites and 3 isolates, 4 sites were determined to be eligible; 1 site was eligible, but due to project design changes made by the proponent, was ultimately not within the project area; 1 remained unevaluated due to not being relocated; 2 were not eligible under the National Historic Preservation Act (NHPA) but contained features considered to be tribally sensitive. The 3 isolates are, by definition, not NRHP eligible, and the remaining sites were determined to be not eligible for NRHP inclusion.

3.7.2 *Environmental Effects*

This section compares the environmental effects of the alternatives proposed and their relation to Issue 6.

3.7.2.1 *Impacts of the Action Alternative*

As proposed, the Action Alternative has the potential to impact cultural resources through surface and subsurface ground disturbing activities, including the creation of drilling pads, drilling holes, road development or improvement and use, and staging area development and use.

The proposed actions encompassed a significant number of acres which had not been previously adequately inventoried for cultural resources. This need was addressed through the Class III inventory of 1880 acres conducted by Barron. The investigation report prepared by Barron was submitted to the Wyoming State Historic Preservation Office (SHPO) on September 16, 2025, as a Notify & Proceed undertaking per the Wyoming SHPO-BLM *Protocol* (2014), which does not require a 15- or 30-day review and concurrence by SHPO. As a result of the findings of 4 eligible sites, 1 unevaluated site (in the absence of new information, managed as if it were eligible), and 2 tribally sensitive sites, the BLM developed design features requiring surface and subsurface avoidance by 30 meters (for eligible sites) or 125 meters (for tribally sensitive sites)

at a minimum to ensure the project will have no significant effect (no adverse effect) to historic properties or other significant cultural resources.

There is a small potential for significant, previously-unidentified buried cultural deposits to be present within the project area. If present, such resources could be impacted by the surface and subsurface disturbing activities of the Action Alternative. As such, the BLM has also included a design feature which requires the proponent (and anyone working on their behalf) to abide by specific discovery responses.

Design features to be applied for the purposes of protecting cultural resources are below:

Due to the potential to affect significant and sensitive cultural resources, the proponent (and/or any person[s] working on their behalf on federal lands) shall ensure that all surface and subsurface impacts avoid seven (7) defined areas. Georeferenced PDFs and/or shapefiles (or equivalent file types) which illustrate the precise areas to be avoided shall be provided to the proponent prior to work commencing.

- Any cultural and/or paleontological resources (historic or prehistoric site or object fossil) discovered by the holder, or any person working on his behalf, on public or Federal land shall be immediately reported to the authorized officer. Holder shall suspend all operations in the immediate area of such discovery until written authorization to proceed is issued by the authorized officer. An evaluation of the discovery will be made by the authorized officer to determine appropriate actions to prevent the loss of significant cultural or specific values. The holder will be responsible for the cost of evaluation and any decision as to proper mitigation measures shall be made by the authorized officer after consulting with the holder.

3.7.2.2 *Impacts of the No Action Alternative*

Under the No Action Alternative, no new surface or subsurface ground disturbance is proposed. Cultural resources which were previously identified, as well as those newly identified through the Class III inventory, would continue to be subject to the current natural conditions such as aeolian processes (such as wind erosion, deflation) and hydrologic processes (erosion, deposition; rainfall, snowfall). The No Action Alternative does not have the potential to impact cultural resources.

CHAPTER 4: PUBLIC INVOLVEMENT, CONSULTATION AND COORDINATION

4.1 Public Involvement

Following the requirements under 43 CFR 3809.5, the project proponent submitted the Plan on April 4, 2025. The BLM reviewed the Plan for completeness per the specific requirements found at 43 CFR 3809.401 and determined the Plan complete April 18, 2025. Once the BLM determined the Plan complete, the Riverton Ranger and Lander Journal published a notice of availability and scoping notice of the Plan on April 26, 2025, for local circulation. The BLM Wyoming State Office published a press release on May 5, 2025. The Riverton Ranger, Lander Journal, K2 Radio, and WyoToday.com published similar articles describing the public scoping period. Responses from eight individuals or organizations were received during the scoping period totaling 55 individual comments. Comments were received from local private landowners inquiring about permissions to the area, several individuals in opposition to the project, the

Wyoming Game and Fish Department (WGFD) with comments on wildlife, the Wyoming Outdoor Council (local non-profit group) with various concerns, and the U.S. Environmental Protection Agency (EPA) with various comments. In general, the scoping comments address concerns for wildlife, cultural resources, water resources, riparian/wetlands, grazing, recreation, Tribal consultation, socioeconomics, and air quality. See Appendix B for a table of comments received and BLM responses. Additionally, the comments are addressed in applicable resource and issues analysis sections of the document below.

4.1.1 Summary of Public Comment

See the comments document included in the documents section of this project on the BLM ePlanning website for a summary of comments received and BLM responses.

4.2 Consultation and Coordination

Person Consulted	Title	Agency/Tribe/Organization
Sara Sheen	Wyoming State Historic Preservation Officer	Wyoming State Historic Preservation Office
Brent Breithaupt	Regional Paleontologist	Bureau of Land Management (WY, ID, NE, AK)
Nancy Williams	District Supervisor	Wyoming Department of Environmental Quality – Land Quality Division
Zach Gregory	Wildlife Biologist	Wyoming Game and Fish Department
Will Schultz	Habitat Protection Supervisor	Wyoming Game and Fish Department

LIST OF PREPARERS

Name	Title	Responsible for
Liz Lynch	Archaeologist, Paleontology Coordinator	Cultural Resources, Native American Religious Concerns, Paleontological Resources
Luke Nelson	Rangeland Management Specialist	Livestock Grazing, Range Vegetation, Soils, Farmlands (Prime and Unique), Wetlands & Riparian Zones
Emma Freeland	Wildlife Biologist	T&E Fish and Wildlife species, BLM sensitive species and other wildlife resources
Clay Stott	Wild Horse and Burro Specialist	Wild Horses and Burros
Jared Oakleaf	Recreation Planner	Recreation, Public Health/Safety, Visual Resources, Special Designations
Tom Sunderland	Geologist	Project Manager, Geology and Hydrology
Shawn Phillips	Fuels Specialist	Fuels/Fire Management
Ira Waldron	Natural Resource Specialist	Fluid Minerals

Name	Title	Responsible for
Ryan Brentzel	Natural Resource Specialist	Hazardous Waste
Jim Gates	Forester	Forestry
Brad Trauntvein	Natural Resource Specialist	Invasives
Paul Patrikus	Planning & Environmental Specialist	NEPA Compliance Review, Air Quality, Socioeconomics
Darci Anacker	Assistant Field Manager, Minerals and Lands	Reviewer, Lands and Realty
Brian Truax	Assistant Field Manager, Resources	Reviewer, Resources

APPENDICES

APPENDIX A – Resources Considered and Eliminated from Detailed Analysis

The following list of resource and features not present within the project area and not discussed in this EA:

- Areas of Critical Environmental Concern
- BLM Natural Areas
- Congressionally Designated Trails
- Prime or Unique Farmlands
- Fluid Mineral Resources (Surface)
- Fluid Mineral Resources (SubSurface)
- Flood Plains
- Paleontological Resources
- Wild and Scenic Rivers
- Wilderness/WSA
- Wild Horses and Burros
- Woodland/Forestry
- Wastes (Hazardous or Solid)
- Areas with Wilderness Characteristics
- Travel and Transportation
- Class I Airsheds
- Unique Geologic features or cave/karst resources

Resources and features present in the project area that did not require detailed analysis to determine effects of the proposed action or alternatives include:

Resource/Feature Present	Rationale for Determination
Habitat for big game, including mule deer and pronghorn crucial winter range.	The Cedar Ridge, South Steffen Hill, and Gem units are all located within designated pronghorn crucial winter range. Portions of the South Steffen Hill and Railroad units, as well as the entirety of the remaining units, are located within mule deer crucial winter range. LFO RMP Decision 4061 states “Prohibit surface-disturbing and disruptive activities within identified big game crucial winter range (Maps 18-22) from November 15 to April 30...unless an exception, waiver, or modification is granted by the Authorized Officer. Authorize exceptions for reclamation seeding when appropriate.” Therefore, the BLM has applied a wildlife timing stipulation stating the following: “The project is within crucial winter range for big game. Surface disturbance and disruptive activities are prohibited in the project area from November 15 - April 30.” This timing limitation substantially minimizes impacts to big game in the sensitive winter season. This restriction is consistent with the Game and Fish timing limitation recommendation provided in their Wildlife Environmental Review letter, received by the BLM on May 27, 2025.

	Overall surface disturbance is minimal at 37 acres spread across a 1,982-acre project area. Pads will be reclaimed as soon as practicable following disturbance. For these reasons, issues relating to big game habitat were not carried forward for analysis.
Greater sage-grouse lekking and nesting habitat	The project area is not within Greater Sage-grouse Core Area; however, the entirety of the Cedar Ridge Unit is within two miles of the Dolus Hill lek. LFO RMP Decision 4105 states: "...Outside of Core Area, prohibit surface-disturbing and/or disruptive activities from March 15 to June 30 within 2 miles of the perimeter of occupied leks..." Therefore, the BLM has applied a wildlife timing stipulation stating the following, which applies to the Cedar Ridge unit only: "Surface disturbance and disruptive activities are prohibited during the period of March 15 - June 30." This timing limitation substantially minimizes impacts to sage-grouse during their sensitive seasons. This restriction is consistent with the Game and Fish timing limitation recommendation provided in their Wildlife Environmental Review letter, received by the BLM on May 27, 2025. The area proposed for disturbance is sparsely vegetated badlands type soils with limited sagebrush that do not comprise suitable sage-grouse habitat. For these reasons, issues relating to greater sage-grouse were not carried forward for analysis.
Migratory bird nesting habitat	The project area contains ample suitable habitat for a variety of nesting migratory birds, including BLM sensitive species mountain plover, sage-thrasher, loggerhead shrike, Brewers sparrow, sagebrush sparrow, as well as dozens of species of migratory birds not designated as BLM sensitive. LFO RMP Decision 4077 states: "Require seasonal restrictions or other identified mitigation as needed to minimize impacts to migratory birds and their habitats protected by the Migratory Bird Treaty Act." Therefore, the BLM has applied a migratory bird timing limitation as follows: "The project area is within suitable nesting habitat for a variety of migratory birds. For activities from May 1 – July 15, a survey must be conducted 7 days prior to surface disturbing and/or disruptive activities by a wildlife biologist using standardized methods. If surface disturbing and/or disruptive activities cannot be initiated within 7 days after survey, an additional survey will be necessary before activities can commence during the stipulated nesting period. If the proponent desires to operate during the timing restriction, a survey of the proposed disturbance area(s) will be conducted by the proponent to determine the presence/absence of nesting migratory birds. If the survey locates an active nest or finds signs to indicate that active nest is likely to be present, then surface disturbing and/or disruptive activities would be delayed until chicks have fledged. Nest surveys should include a 10-meter buffer around any area of surface disturbance. Survey data forms and results will be provided to BLM Lander Field Office before disturbance activities are authorized."

	Adherence to the timing limitation will minimize impacts to migratory birds, therefore, this issue was not carried forward for analysis.
Nesting Raptors	There is abundant raptor nesting habitat in or adjacent to the various project units in the form of rock outcrops, cottonwood trees, and conifers. A red-tailed hawk nest was identified in the North Canning unit in 2024 and an additional occupied red-tailed hawk nest was identified in the Arrowhead unit in 2025 (Real West Natural Resource Consulting 2025). LFO RMP Decision 4071 states: “Prohibit surface-disturbing and disruptive activities within ¾ mile of active raptor nests, except ferruginous hawk nests for which surface-disturbing and disruptive activities are prohibited within 1 mile, during the following time periods: • February 1 to July 31 for all raptors except northern goshawk and burrowing owl • April 1 to August 31 for northern goshawk • April 1 to September 15 for burrowing owl Distances and dates may vary based on raptor species, chick fledging, topography, and other pertinent factors. “ Therefore, the BLM has applied a timing limitation prohibiting drilling activities in this time period within these buffers of active nests. If the proponent requests to work during the timing limitation, the BLM will require a survey in accordance with BLM standards to confirm status of known nests and search for additional new nests.
Threatened and Endangered Plant and Animal Species	In a letter dated June 18, 2025, the USFWS confirmed that the only listed species with potential to occur in the project area is Ute ladies'-tresses. Field survey performed by Real West Consulting showed streams in the area to be ephemeral in nature, and do not comprise habitat for Ute ladies'-tresses. Therefore, the proposed action will result in no effect to the listed species Ute ladies'-tresses.
Hydrologic Conditions and Water Quality	The project occupies the West Fork and East Forks of Dry Creek watersheds. Construction and disturbances within these drainage areas could create potential for erosion and sedimentation which could impact hydrologic conditions and water quality in these drainages. However, design features of the proposed action would minimize this potential such as identifying and cleaning any leaks or spills in compliance with the spill contingency plan, managing run off through implementation of best management practices (in compliance with the SWPPP). Additionally, reclamation would occur within the same season as disturbance, which would further prevent potential for impacts from sedimentation or erosion. For these reasons, no specific impacts to hydrologic conditions or water quality are anticipated through the proposed action that warrants detailed analysis or implementation of mitigation. Potential impacts to groundwater from the proposed action are unlikely, and prompt drillhole plugging in

	accordance with State standards as described in the proposed action would ensure protection of any groundwater resources.
Livestock Grazing	The proposed plan of operations would result in 36.19 acres of surface disturbance, which is a small portion of the total acres available for permitted livestock grazing. In addition, there is a reclamation plan in place to return this 36.19 acres to its original vegetation production, immediately after exploration operations are completed. Project activities will not significantly impact permitted livestock grazing. The proposed action would not result in a change to current permitted livestock grazing use. Therefore, livestock grazing will not be carried forward for further analysis.
Prime or unique Farmlands	The proposed plan of operations lists that topsoil will be stockpiled with tracked equipment including excavators and dozers. Topsoil that will be stockpiled over the winter shutdown will be seeded with an approved BLM interim seed mix to prevent erosion and to aid in overall revegetation success. Because of these practices, there will be no overall impact on prime and unique farmlands
Soils	The proposed plan of operations from the proponent lists that topsoil will be stockpiled with tracked equipment including excavators and dozers. Topsoil that will be stockpiled over the winter shutdown will be seeded with an approved BLM interim seed mix to prevent erosion and to aid in overall revegetation success. Which means there will be no overall significant impact of soils.
Invasives	The project proponent will be responsible for weed control and prevention within the project area. Certified weed-free seed will be used in reclamation efforts, and equipment will be washed prior to entering the project area.
Lands and Access	The proposed action project area contains existing Rights-of-Way (ROW), including roads, telephone, powerlines, and pipelines. Standard industry practice of locating buried utility will mitigate any risk from the proposed drilling to the buried ROWs. The main road (ROW) within the project area is WYW-81240, which is the County Road. The proposed action will have no impact to the ROW.
Fuels/Fire Management	The proposed action will have no significant impacts on fuels and fire management even though the resource is present. The reclamation and revegetation plan outlined in the proposal will not create a hazardous fuels or wildfire problem.
Air Quality	The proposed Project is not within a non-attainment area or areas where total suspended particulates or other criteria pollutants exceed Wyoming air quality standards. Project activities would result in negligible short-term adverse effects to air quality in the form of vehicle emissions (Appendix B – Emissions Inventory). Estimated emissions from the Project are below the threshold which would require further evaluation of an emissions source. Adherence to applicable state and federal regulations and permits should

	maintain potential impacts on air quality at a negligible level. Therefore, this element is not further analyzed in this EA.
Socioeconomics	Socioeconomic impact is measured through two lenses: values and groups. As part of the analysis for this EA, the BLM sought to determine what effects the proposed action would have on relevant groups in relation to applicable socioeconomic values. This analysis requires a multi-disciplinary approach to determine what resources could or would be changed as a result of the proposed action and how that would impact particular groups that utilize those resources. The BLM used comments received as part of the scoping process, interdisciplinary specialist input, and the BLM's Socioeconomic profiling tool (SEP) to analyze the impacts of this proposed action. Based on the information gathered about the proposed action and affected groups/values an economic value could be used to determine severity of the action, but in the process of analyzing this project it was determined that the impacts from this project would likely not be cause for significant environmental impacts or significant socioeconomic impacts, and therefore economic value associated with impacts from the project are largely not able to be meaningfully measured with a monetary value. This does not mean the project is without socioeconomic impact, but it was determined that effects would not have a significant impact on the socioeconomics of Fremont County because it is an exploratory drilling project that is sufficiently limited, tangibly and temporally, in scope and scale to limit the analysis required.
Citizens Proposed Wilderness Areas and lands with wilderness characteristics.	Some of these operations are in the Fuller Peak Citizens Proposed Wilderness area. The BLM inventoried the Citizens Proposed Wilderness area in support of the 2014 Lander RMP and found the area to not contain wilderness characteristics. The remaining portions of the project area were inventoried in support of the 2014 Lander RMP and were also found to not contain wilderness character. These inventories and the findings are current, as there has been no change in condition or submission of contrary evidence since the completion. For these reasons this resource is found to not be present in the project area.
Recreation	The project area is not within a Recreation Management Area (RMA) as designated in the 2014 RMP and therefore is not managed for specific recreation settings, activities, or outcomes. A comment received during public scoping advocated that BLM analyze and disclose the impacts to hunting in the area. As stated earlier, the 2014 Lander RMP did not designate this area as a Recreation Management Area. Inherent in RMA designation is objectives containing indicators and standards that provide clear context and intensity to potential impacts to recreation. A speculative analysis of how this action might or might not impact hunting would not substantially contribute new design features or alternatives that merit consideration. Instead, the area is managed under the basic stewardship objectives to ensure

	resource protection from recreation, reduce use conflicts, and protect human health and safety. The proposed action does not conflict with these objectives and therefore doesn't require detailed analysis or consideration of design features. For these reasons, this issue was not analyzed in detail.
Fisheries	There are some perennial streams within the project area, however, native fish are not known to occur in the vicinity. Drilling operations would not impact fish.
Visual Resources	Portions of the project area are within VRM Class II and IV. While the proposed actions may induce visual contrast that exceeds the acceptable levels established within the class II objective. For this reason, issues associated with visual resources or scenic quality are not analyzed in detail.
Paleontological Resources	Per the Wyoming Geological Survey, the project area includes sediments associated with the Wind River Formation, Wagon Bed Formation, and pediment colluvium deposits. The Wind River and Wagon Bed Formations are Eocene in age and have a Potential Fossil Yield Classification (PFYC) of 5 – Very High. As such, a paleontological resources survey was necessary. The proponent retained Stratigraphic rex LLC to conduct the paleontological survey, which resulted in no findings of significant paleontological localities nor other rationale requiring design features. Given the lack of localities or other paleontological resources necessitating the application of project-specific design features, paleontological resources are not analyzed in detail here.
Groundwater quality and characteristics	Groundwater resources are present within the vicinity of the proposed action and alternatives such as aquifer recharge/discharge areas and groundwater wells; however, no sole source aquifers are present in the area. Scoping comments suggest analysis of potential for impact to the Madison Aquifer and connectivity of project activities to deep disposal wells. The Madison Aquifer is approximately 23,000 ft deep in the vicinity of the project area within the northeastern extent of the Wind River Basin. The proposed drilling under the Plan primarily targets uranium deposits in Eocene age sediments and Precambrian age granitic rocks up to 1,500 ft deep. Outcrops of the Madison Formation to the northeast of the project area in the Owl Creek Mountains occupy a different geologic and hydrologic basin (Bighorn Basin) and are not part of the Madison Aquifer in the Wind River Basin. These outcrops of Madison Formation might recharge portions of the Madison aquifer in the Bighorn Basin through infiltration of surface water and leakage from overlying formations; however, there is no hydrologic connectivity between Precambrian age granites exposed in the Owl Creek Mountains near outcrops of the Madison Formation or Eocene age sedimentary rocks in the Wind River Basin to the Madison Aquifer in the Bighorn Basin.

	Additionally, drilling activities are unlikely to encounter significant water resources in the formations or depths proposed, and water used for drilling will be controlled and recirculated during drilling and plugging procedures, so impacts to underlying aquifers are not anticipated. Additionally, the nearest disposal well is approximately 8 miles to the southeast with disposal into the Fort Union Formation at approximately 12,000 ft deep. There is no potential for hydrologic connectivity between the proposed activities and existing deep disposal wells because of the difference in targeted unit depths, distance, and lack of transmissivity in granitic rocks.
Special designations (Copper Mountain WSA)	The BLM's guidance on management of Wilderness Study Areas (WSAs) directs the BLM to not apply buffer zones to WSAs, and the Copper Mountain WSA is approximately seven miles from the nearest proposed activities; therefore, this issue was eliminated from detailed analysis in the EA.
Radiation hazards and radiological sources	The BLM does not anticipate any increase above background levels in radiological dose to recreators, public land users, or nearby residents as a result of the proposed action or alternatives. Besides the cores and samples, which will be immediately removed from the site, drilling activities as proposed do not create or expose radionuclides that could potentially increase radiation above natural background levels. Naturally occurring uranium in drill cores, chips, cuttings, or samples, occurs as uranium 238 in ranges up to 1.3% eU3O8. Uranium 238 at these concentrations does not present changes to human health or safety. Additionally, there are no identified concentrations of radionuclides or high emitting radiation sources within vicinity of the proposed project area that could potentially cause impacts to the public or locals. Drill core and samples will be removed from the site by the applicant immediately after drilling. No storage of drill cores or samples is proposed under the Plan. The BLM does not have the authority to regulate handling of drill cores or samples to minimize radiological exposures. Additionally, the BLM does not regulate radiological exposure limits or set standards or requirements for monitoring or mitigations related to radiation safety. Additionally, there are no known exposures of concentrations of Naturally Occurring Radioactive Materials (NORM) or Technologically Enhanced NORM (TENORM) in the vicinity of the proposed project area that have not been adequately isolated and reclaimed through the Wyoming and BLM Abandoned Mine Lands program (Arrowhead Mine). Mud pits and tanks would recirculate drill water, mud, and cuttings and would be adequately isolated and protected from exposure through burial during reclamation. Additionally, the BLM does not regulate TENORM. The BLM does not anticipate the need to require radiological monitoring because the exposure potential is low, and the BLM does not

	have the expertise and authority to enforce radiological exposure limits or set standards for monitoring for radiation levels.
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APPENDIX B: Air Quality Tables

Wyoming Ambient Air Quality Standards (WAAQS)

Pollutant	Average Time	Maximum Allowed
Particulate Matter PM _{2.5}	24 Hour	35 ug/m ³
	Annual Mean (Primary)	9 ug/m ³
	Annual Mean (Secondary)	15 ug/m ³
Particulate Matter PM ₁₀	24 Hour	150 ug/m ³
	Annual Mean	50 ug/m ³
Nitrogen Dioxide	1 Hour	100 ppb
	Annual Mean	53 ppb
Ozone O ₃	8 Hour	70 ppb
Sulfur Dioxide SO ₂	1 Hour	75 ppb
Carbon Monoxide	1 Hour	35 ppm
	8 Hour	9 ppm

Project estimate of emissions

Source	Emissions									
	PM		SO ₂		NOx		CO		VOC	
	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr
4x4 Backhoe or Excavator	0.066	0.12	0.001	0.0018	1.607	2.892	1.118	2.01	0.085	0.153
Dozer	0.059	0.035	0.002	0.0012	1.119	0.671	1.021	1.22	0.059	0.035
Drill Rigs (RC)	0.161	0.096	0.005	0.003	3.050	1.83	2.782	1.66	0.161	0.097
Drill Rigs (Core)	0.074	0.088	0.002	0.0024	1.402	1.682	1.279	1.53	0.074	0.088
Water Truck	0.116	0.056	0.004	0.00096	2.213	1.062	2.019	0.96	0.116	0.055
Service Truck	0.177	0.254	0.002	0.00288	0.984	1.416	1.31	0.115	0.052	0.074
Light Pick-up Trucks, Gas	0.142	0.034	0.006	0.00144	3.647	0.872	3.327	0.79	0.192	0.046
Total	0.795	0.683	0.02	0.013	14.044	10.42	12.44	8.28	.73	0.548

- Lb/hr - pounds per hour of emissions from individual equipment from one source type, for example: the emissions per hour for one backhoe, or one dozer, etc.
- Ton/yr – assumes maximum possible usage per year. For example: light pick-up trucks NOx emissions: 3.647 lbs/hr x 120 (maximum annual hours) x 4 (maximum number of vehicles that would be used) = .872 ton/yr.

Hazardous Air Pollutants (HAPs) estimates from project

Pollutants	Emissions ton/yr
Benzene	0.0033
Toluene	0.0012
Xylenes	0.00084
Formaldehyde	0.00033
Acetaldehyde	0.000108
Acrolein	0.000033
Naphthalene	0.00057
Total	0.0063

Emissions Source Inventory

4x4 Backhoe or Excavator		
Maximum Daily Hours of Operation	10	hours/day
Maximum Annual Hours of Operation	1200	hours/year
Hourly Fuel Consumption	3.5	gal/hour
Annual Fuel Consumption	9000	gal/year
Horsepower	97 hp	
No. Units	3	
Dozer		
Maximum Daily Hours of Operation	10	Hours/day
Maximum Annual Hours of Operation	1200	Hours/year
Hourly Fuel Consumption	9.1	Gal/hour
Maximum Annual Fuel Consumption	10921	Gal/year
Horsepower	155	
No. Units	1	
Water Truck (2,000-4,000 gallon)		
Maximum Daily Hours of Operation	4	Hours/day
Maximum Annual Hours of Operation	480	Hours/year

Hourly Fuel Consumption	9.0	Gals/hour
Maximum Annual Fuel Consumption	4320	Gal/year
Horsepower	425	hp
No. Units	2	
Service Truck		
Maximum Daily Hours of Operation	6	Hours/day
Maximum Annual Hours of Operation	720	Hours/year
Hourly Fuel Consumption	4	Gals/hour
Maximum Annual Fuel Consumption	2880	Gal/year
Horsepower	200	hp
No. Units	2-4	
Light pick-up truck		
Maximum Daily Hours of Operation	1	Hours/day
Maximum Annual Hours of Operation	120	Hours/year
Hourly Fuel Consumption	5.0	Gals/hour
Maximum Annual Fuel Consumption	600	Gal/year
Horsepower	375	hp
No. Units	2-4	
Drill Rigs (RC)		
Maximum Daily Hours of Operation	10	Hours/day
Maximum Annual Hours of Operation	1200	Hours/year
Hourly Fuel Consumption	12.4	Gals/hour
Maximum Annual Fuel Consumption	14880	Gal/year
Horsepower	485	hp
No. Units	1	
Drill Rigs (Core)		
Maximum Daily Hours of Operation	10	Hours/day

Maximum Annual Hours of Operation	1200	Hours/year
Hourly Fuel Consumption	5.7	Gals/hour
Maximum Annual Fuel Consumption	6840	Gal/year
Horsepower	250	hp
No. Units	2	

APPENDIX C: MAPS

MAP 1

