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

FIELD OFFICE: Stillwater Field Office

NEPA NUMBER: DOI-BLM-NV-C010-2013-0026-DNA

CASEFILE PROJECT NUMBER: NVN-091836

PROPOSED ACTION TITLE/TYPE: Above ground drilling water pipeline.

LOCATION/LEGAL DESCRIPTION:
Mount Diablo Meridian
T. 24 N., R. 36 E.,
sec. 13, N\%N\%, SE\%NE\% (within);
sec. 14, NE\%, SE\%NW\%, NE\%SW\% (within),

T. 24 N., R. 37 E.,
sec. 18, lots 5, 6, 8, 9 (within).

Churchill County, Nevada.

APPLICANT: TGP Coyote Canyon, LLC

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

TGP Coyote Canyon, LLC proposes to construct a temporary, above-ground, 6-inch polyurethane water pipeline to transport freshwater from an existing water well, near the Dixie Valley Geothermal Plant, to geothermal well 36-14 for drilling operations. Approximately 9,850 feet of pipe has already been constructed (authorized by a previously approved Sundry Notice) to serve the 76-14 geothermal well. An additional 4,100 feet would be added to reach the 36-14 well pad. The pipeline would be placed just outside the south ditch of the Dixie Valley Road. The pipeline would cross existing roads through 12-inch culverts that would be buried in the road surface to allow vehicles to cross over the pipe without crushing it. No new surface disturbance outside of the previously disturbed road crossings would be created by the pipeline. Some scuffing of the surface may occur during construction or if the pipe shifts. Only freshwater would be transported through the pipeline. The pipeline would be constructed entirely on public lands. A 13,950-foot long by 10-foot wide right-of-way (3.020 acres) would accommodate construction, maintenance, and removal of the pipeline. The right-of-way would have a five year grant term.

The Plan of Development (POD) submitted on January 14, 2013 provides further detail regarding the construction, operation, maintenance, and decommissioning of the pipeline.
B. Land Use Plan (LUP) Conformance

LUP Name*Carson City CRMP
Date Approved: May 11, 2001

*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 LUP, even though it is not specifically provided for, because it is clearly consistent with the following LUP decisions (objectives, terms, and conditions):

Administrative Actions #6, page LND-7: “Exchanges and minor non-Bureau initiated realty proposals will be considered where analysis indicates they are beneficial to the public.”

RMP Level Decisions, Desired Outcomes #1, page MIN-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.”

Administrative Actions #1, Standard Operating Procedures, Leasable Minerals, page MIN-5: “Oil, gas, and geothermal exploration and production upon BLM land are conducted through leases with the Bureau and are subject to terms and stipulations to comply with all applicable federal and state laws pertaining to various considerations for sanitation, water quality, wildlife, safety, and reclamation. Stipulations may be site specific and are derived from the environmental analysis process.

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

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

DOI-BLM-NV-C010-2012-0051-EA
Carson City District Office – TGP Dixie Development Company, LLC, Coyote Canyon South Geothermal Exploration EA and FONSI/DR signed on December 18, 2012.

D. NEPA Adequacy Criteria

1. Is the new proposed action a feature of, or essentially similar to, an alternative analyzed in the existing NEPA document(s)? Is the project within the same analysis area, or if the project location is different, are the geographic and resource conditions sufficiently similar to those analyzed in the existing NEPA document(s)? If there are differences, can you explain why they are not substantial?
Yes. The proposed action is essentially similar to the alternative selected by the BLM in EA# DOI-BLM-NV-C010-2012-0051-EA. The Coyote Canyon South Geothermal Exploration EA describes laying black plastic pipe along well access roads to transport drilling water from sources. The 36-14 Geothermal well is not specifically identified in the Coyote Canyon South Geothermal Exploration EA. However, the effects from using polyurethane pipelines to deliver drilling water to the Coyote Canyon Unit were analyzed and the method is a component of the selected alternative in the Decision Record.

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 values?

Yes. The environmental concerns, interests, and resource values have not changed substantially since the completion of the EA in 2012. The range of alternatives in the 2012 EA is still appropriate. The environmental constraints of the geothermal exploration have not changed and the proposed action is very similar to that analyzed in the above referenced EA.

3. Is the existing analysis valid in light of any new information or circumstances (such as, range-land health standard assessment, recent endangered species listings, updated lists of BLM-sensitive species)? Can you reasonably conclude that new information and new circumstances would not substantially change the analysis of the new proposed action?

Yes. The anticipated impacts to the resources have not changed and no new information or circumstances have been identified since the Decision Record was issued on January 17, 2012. The proposed action would create almost no new surface disturbance. The proposed action will not have adverse effects on human health or the human environment.

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 effects of the new proposed action would be very similar to those analyzed and disclosed in the EA in Chapter 3 (Affected Environment and Environmental Consequences).

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

Yes. Public involvement was done during the preparation of the EA and is described in the document. The new proposed action does not differ substantially from what the public was able to review before. Tribal consultation was conducted as a part of the interdisciplinary review of the new proposed action and no new concerns were brought up.
E. Persons/Agencies/BLM Staff Consulted:

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<tr>
<th>Name:</th>
<th>Title/Resource Discipline</th>
<th>Resource/Agency Represented</th>
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</thead>
<tbody>
<tr>
<td>Steve (Chip) Kramer</td>
<td>Planning and Environmental Coordinator</td>
<td>BLM 3-4-13</td>
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<tr>
<td>Jill Devaurs</td>
<td>Public Health &amp; Safety/Grazing/Noxious Weeds</td>
<td>BLM 3-4-13</td>
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<td>Linda Appel</td>
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<td>Chelsea Simerson</td>
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<tr>
<td>Dan Westermeyer</td>
<td>Recreation/Wilderness/VRM/LWC</td>
<td>BLM 3-4-13</td>
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<tr>
<td>Jason Wright</td>
<td>Archeology</td>
<td>BLM 11-1-13</td>
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<tr>
<td>KelleySterle</td>
<td>Water Quality</td>
<td>BLM 3-4-13</td>
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<tr>
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Note: Refer to the EA/EIS for a complete list of the team members participating in the preparation of the original environmental analysis or planning documents.

**Conclusion**

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 requirements of the NEPA.

Signature of Project Lead

Signature of NEPA Coordinator

Signature of Responsible Official

Date 3/11/2013

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.