FIELD OFFICE: Stillwater Field Office, Carson City District

TRACKING NUMBER: DNA No., DOI-BLM- NV-C010-2010-0006-DNA

CASEFILE PROJECT NUMBER & LOCATION: Gabbs Valley Geothermal Exploration Project:
  DOI-BLM-NV-C010-2010-0006-EA; FONSI DR Signed January 13, 2010;
  Notice of Intent NVN 083205; Geothermal Unit NVN 084239
  Gabbs Valley, Nye County, NV;

Lease and Legal Description: MDBM
  Geothermal Lease NVN 076822
  Relocate TGH/GDP 24-17 previous 10 acre survey (the Kettleman Numbers remain
  the same) T13N, R34E, Sec. 17 NW1/4;
  Relocate TGH/GDP 45-20 within previous 10 acre survey (the Kettleman Numbers
  remain the same) T13N, R34E, Sec. 20 SW1/4;
  Relocate TGH 36-18 to TGH 75-29: T13N, R34E, Sec. 29, SE1/4.

PROPOSED ACTION TITLE/TYPE: Relocate 2 Wells previously approved as both
  Temperature Gradient and Observation Exploration Wells (TGH/GDP) and 1 Temperature
  Gradient Well (TGH).

APPLICANT (if any): Ormat Nevada, Inc. (Ormat)

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

Ormat proposes to relocate 3 drill sites previously analyzed in BLM EA: DOI-BLM-NV-C010-
0006-EA and approved under Decision of Record signed on January 13, 2010. The reason for
the relocation is a new interpretation, by Ormat, of their geophysics. This action would be
conducted within the previous cultural survey areas.

The 2 TGH/GDP’s are being moved within the previous area surveyed for and approved for
TGH/Observation well sites.

For the TGH well, Ormat is proposing to relocate TGH 36-18 to TGH 75-29. They propose a
minimal impact program that would consist of a track mounted drilling rig, a rubber tired off-
road crawler to carry pipe, water and fuel, a backhoe to dig the reserve pit, a rubber tire pipe
buggy, and an ATV to move personnel to the site. No pad construction is proposed, but a small
reserve pit will be required and there will be impacts to vegetation of approximately 0.5 acre,
along with a cross country road of 2500’x 15’ equal to 1 acre for a total of 1.5 acres. The
previous proposal permitted a constructed pad.
B. Land Use Plan (LUP) Conformance

LUP Name: Carson City Field Office Consolidated Resource Management Plan
Date Approved: May 9, 2001

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

Objective 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.

Objective 2: 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.
1) DOI-BLM-NV-C010-2010-0006-EA; FONSI DR Signed January 13, 2010;
Notice of Intent NVN 088205; Geothermal Unit NVN 084239
Gabbs Valley, Nye County, NV;

List by name and date other documentation relevant to the proposed action (e.g., biological assessment, biological opinion, watershed assessment, allotment evaluation, and monitoring report). Not applicable.

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, geothermal exploration/production well drilling, is the same as that analyzed in DOI-BLM-NV-C010-2010-EA and approved in the FONSI/DR signed January 13, 2010.

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?
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?

The anticipated impacts to the resources have not significantly changed since the 2010 EA was completed. The proposed action will not have any adverse effect on Sage Grouse, the human health or environment of minority and low income populations. The proposed action will be required to comply with those stipulations applied to the project in the FONSI/DR which will limit the spread of noxious weeds and prevent any cumulative impacts.

4. Are the direct, indirect, and cumulative effects that would result from implementation of the new proposed action be similar (both quantitatively and qualitatively) to those analyzed in the existing NEPA document?

Yes, the methodology and analytical approach used in the 2010 EA where the analyzed action is the same as the proposed action remains appropriate, as geothermal drilling and its potential impacts are minimized when standard operating procedures, conditions of approval, monitoring, and mitigation are followed as described in the current proposed action and the existing NEPA document.

Yes, the 2010 EA analyzed cumulative impacts on relevant resources. The cumulative impacts to public lands resulting from the relocation of these wells would remain unchanged from that analyzed in the 2010 EA. As disclosed in that EA, there would be no resource specific cumulative impacts, excepting cultural resources.

All future exploration and development proposals would be subject to separate NEPA review at which time cumulative impacts would be analyzed in detail. Any proposal for exploration or development may be modified or denied by the BLM in order to prevent irreparable and/or undue degradation or harm to one or more resources

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

Yes, public involvement associated with the 2010 EA remains adequate. Consultation with other agencies, the general public, and Native American Tribes was conducted for that document. The Yomba Shoshone Tribe, Walker River Paiute Tribe and Yerington Paiute Tribe were consulted for the 2010 EA. The Yomba Shoshone Tribe requested information regarding any future project and will be notified via letter of the proposed new drilling project and site. Consultation will continue with tribal representatives on future geothermal projects in this area. In addition, geothermal exploration companies must apply to the county government for a special use permit for any drilling proposed in the county and the public is aware of these proposals via the local county process.
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<tr>
<th>Name</th>
<th>Position</th>
<th>Resource/Agency Represented</th>
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<tbody>
<tr>
<td>Susan McCabe</td>
<td>Archaeologist</td>
<td>Stillwater Field Office</td>
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<tr>
<td>John Wilson</td>
<td>Resource Staff Supervisor</td>
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<tr>
<td>Gabriel Venegas</td>
<td>Hydrologist</td>
<td>Stillwater Field Office</td>
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<tr>
<td>Teola Brady</td>
<td>Environmental Director</td>
<td>Yomba Shoshone Tribe</td>
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Note: Refer to the 2010 EA for a complete list of the team members participating in the preparation of the original environmental analysis or planning documents.

**Conclusion** (If you found that one or more of these criteria is not met, you will not be able to check this box.)

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 constitute BLM’s compliance with the requirements of the NEPA.

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Carla James, Project Lead and Resource Staff Supervisor  
Stillwater Field Office, Carson City District

Desna Young, NEPA Coordinator  
Stillwater Field Office, Carson City District

Teresa J. Knutson  
Stillwater Field Manager, Carson City District

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.