Suggested Pre-Plan of Operations Coordination Process

**Introduction**

The Bureau of Land Management (BLM), in its ongoing efforts to improve permitting efficiencies, encourages the implementation of a “Pre-Plan of Operations” phase as part of the Plan of Operations (mine plan) review process. The following is an outline of the suggested process sequence.

Step 1- **Operator contacts the BLM**. The operator contacts the Field Office as soon as their decision has been made to pursue the development of a mine plan or a major modification to an existing mine plan and is able to provide conceptual drawings and maps. In many cases, this notification can be one or more years before an actual submittal of a mine plan to the BLM for review.

Step 2- **Initial Project Presentation**. The operator, along with any technical contractors, conducts a proposed mine plan presentation to the BLM. The Nevada Division of Environmental Protection (NDEP) Bureau of Mining Regulation and Reclamation (BMRR) will be informed by the BLM of the presentation and may choose to attend. In the case where Greater Sage-grouse (GRSG) habitat may be affected, an invite to the presentation should also be extended to the Department of Conservation and Natural Resources (DCNR) to attend. The BLM managers and interdisciplinary team are initially introduced to the project and can begin to formulate and identify issues, concerns, and probable information needs. The BLM will convey to the operator recommendations for baseline studies appropriate for a complete Plan submittal.

Step 3- **Pre-Plan of Operations Kick-Off Meeting**. Soon after the initial presentation, the operator, the BLM and the BMRR meet to review the project proposal, review the BLM and BMRR permitting requirements, recommend use of the Voluntary Plan of Operations Outline/Format, determine information needs for the permitting and environmental analysis, and review the applicable agency policies and requirements for mine permitting.

Step 4- **Documentation of Information Needs**. The BLM provides the operator a documented summary of the relevant known resource issues that are present as well as the baseline studies required per 3809.401(b) to be completed in support of the future mine plan submittal and subsequent environmental analysis.

Step 5- **Pre-Plan of Operations Project Schedule**. The operator is encouraged to develop a project schedule in coordination with the BLM and the BMRR for the submittal and review of the baseline reports and applications for State permits and submission of the mine plan to the BLM.

Step 6- **Development of the Plan of Operations**. Experienced BLM mining engineers, geologists and hydrologists may offer advice to the operator to improve the mine plan submittal; potentially minimizing the number of disparities later on and reduce the review time.

Step 7- **Submittal of the Plan of Operations.** The operator submits a mine plan to the BLM with all baseline reports and related information, which may include preliminary analyses. The BLM determines if the mine plan is complete. At that point, the BLM’s regulatory policy and NEPA guidance will govern the remainder of the mine plan review and approval process. Coordination with the BLM, the BMRR and any other appropriate agencies (e.g. DCNR) throughout this process is essential.

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