



# United States Department of the Interior



BUREAU OF LAND MANAGEMENT  
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In Reply Refer To:  
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CERTIFIED MAIL – 9171 9690 0935 0018 6642 77

## DECISION

Susan Carter : September 9, 2014  
49 Ellis Ranch : Competitive Oil and Gas Lease Sale  
Santa Fe, NM 87505 : Elko District

### PROTEST DISMISSED PARCELS OFFERED FOR SALE

On July 7, 2014, the Bureau of Land Management (BLM), Nevada State Office (NVSO), timely received a protest (enclosed) from Susan Carter (Carter). Carter protested all 42 parcels offered in the September 9, 2014 Elko District Competitive Oil and Gas Lease Sale (the Sale).

### BACKGROUND

The BLM received nominations for land for the Sale through June 13, 2013. The nominated lands included land in Federal mineral estate located in the BLM Nevada's Elko District Office (EKDO). After the NVSO completed preliminary adjudication<sup>1</sup> of the nominated parcels, the NVSO screened each parcel to determine compliance with national and state BLM policies, including BLM's efforts related to the management of Greater Sage Grouse Habitat on public lands. The BLM is currently deferring all Greater Sage Grouse habitat acreage, including all lands within Greater Sage Grouse Preliminary Priority Habitat (PPH), Preliminary General Habitat (PGH), and within four (4) miles of leks until the Record of Decision is signed for the BLM National Greater Sage-Grouse Land Use Planning Strategy.<sup>2</sup>

<sup>1</sup> Preliminary adjudication is the first stage of analysis of nominated lands conducted by the State Office to prepare preliminary sale parcels for Field Office review. During preliminary adjudication, the State Office confirms availability of nominated lands for leasing pursuant to 40 U.S.C. § 181 *et seq.*, 43 CFR 3100 *et seq.*, and BLM policies. Once the State Office completes preliminary adjudication, it consolidates the nominated land available for leasing into a preliminary parcel list to send to the Field Office for NEPA analysis and leasing recommendations.

<sup>2</sup> BLM Washington-IM No. WO-2012-043, *Greater Sage-Grouse Interim Management Policies and Procedures* (2011); BLM Washington-IM No. WO-2012-44, *BLM National Greater Sage-Grouse Land Use Planning Strategy* (2011); BLM Nevada-IM No. NV-2012-058, *Revised Direction for Proposed Activities within Greater Sage-Grouse Habitat* (2012); BLM Nevada-IM No. NV-2014-022, *Revised Direction for Proposed Activities within Greater-Sage*

On July 30, 2013, the NVSO sent a preliminary parcel list to EKDO for review. This review included interdisciplinary team review by BLM specialists, field visits to nominated parcels, review of conformance with the Land Use Plans, and preparation of an Environmental Assessment (EA) documenting National Environmental Policy Act (NEPA) compliance.<sup>3</sup> The EKDO preliminary EA was released on January 10, 2014, for a 30-day period of public review that ended on February 10, 2014. The Sale was postponed from June 24, 2014, to September 9, 2014, because the BLM was unable to meet the lease sale schedule time constraints.<sup>4</sup>

The EA tiered to the existing Land Use Plans (Resource Management Plans (RMPs))<sup>5</sup>, in accordance with 40 CFR 1502.20:

*Agencies are encouraged to tier their environmental impact statements to eliminate repetitive discussions of the same issues and to focus on the actual issues ripe for decision at each level of environmental review . . . the subsequent . . . environmental assessment need only summarize the issues discussed in the broader statement and incorporate discussions from the broader statement by reference and shall concentrate on the issues specific to the subsequent action.*

The BLM described its purpose and need for the September 2014 Lease Sale in its EA as follows (p. 2):

### ***1.2 Purpose and Need for Action***

*The need for the leasing of public mineral estate (oil and gas leasing) is to provide for timely exploration and development of energy resources on public lands, thus reducing U.S. dependence on imported supplies. Parcels of federal mineral estate are offered for lease to encourage development of federal onshore oil and gas resources.*

The EA considered two alternatives (p. 7):

- The No Action alternative, which considered denying or rejecting all expressions of interest to lease (parcel nominations); and
- The “Proposed Action” alternative, which included offering up to 44 of the 231 nominated parcels that were sent to the EKDO for review.

The EA also considered an additional alternative, which was eliminated from further analysis (p. 11):

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*Grouse Habitat (2014); and BLM Nevada-IM No. NV-2014-032, Direction for Oil and Gas Competitive Lease Parcel Review (2014).*

<sup>3</sup> See BLM, H-1601-1, *Land Use Planning Handbook*, (Mar. 2005) (p. 42): “after the RMP is approved, any authorizations and management actions approved based on an activity-level or project-specific EIS (or EA) must be specifically provided for in the RMP or be consistent with the terms, conditions, and decisions in the approved RMP.” See also 43 CFR 1610.5-3.

<sup>4</sup> BLM Nevada-IM No. NV-2014-032, *Direction for Oil and Gas Competitive Lease Parcel Review (2014)*.

<sup>5</sup> The Elko RMP, Record of Decision signed on March 11, 1987, for the Tuscarora Planning Area and the Wells RMP and associated Record of Decision signed on July 16, 1985.

## 2.3 ALTERNATIVES CONSIDERED BUT ELIMINATED FROM FURTHER ANALYSIS

### Offering All Nominated Parcels in the September 2014 Sale

There were a total of 214 parcels nominated in the Elko District for the 2014 sale. Of these nominated parcels, 141 have been deferred and 17 parcels have been partially deferred. Reasons for their deferment include:

- Some nominations are located in areas with a very high density of eligible cultural sites and potential Traditional Cultural Properties, and they will be deferred until the Elko District Office completes a new Resource Management Plan (scheduled to begin in 2016).
- The nominated parcels in the Spruce Mountain planning area are being deferred until completion of the Elko District Office Resource Management Plan.
- Parcels or portions of parcels within a four mile radius of active sage grouse leks and parcels located on lands containing Greater Sage Grouse Preliminary Priority Habitat have been deferred unless they are within the operations area of pending oil & gas exploration plans. These deferred parcels will not be offered for sale until completion of the Nevada & Northeastern California Greater Sage Grouse EIS.
- One parcel was removed due to its proximity to several drinking water source water protection areas associated with the Spring Creek Community.

On June 11, 2014, the NVSO published a *Notice of Competitive Oil and Gas Lease Sale for September 9, 2014*<sup>6</sup> (Notice),<sup>7</sup> resulting in a total of 44 parcels offered for lease. Two additional parcels were withdrawn from the sale and the Notice was amended to remove those parcels. This protest challenges the EA and all 42 parcels described in the Notice, as amended.

### ISSUES

Carter participated in the EKDO public review of the EA, and provided comments to which the EKDO responded in a comments table, included in the case file. Carter's February 7, 2014, email requested that 47 parcels in herd management areas be removed from the lease sale. Carter's February 10, 2014, email further stated, "*Stop! Leave the horses. Hold off on the tracking (sic) on OUR Public Land*". The Carter arguments in the protest are very different than the comments she provided the EKDO during their review of the EA.

The BLM has reviewed the Carter arguments in their entirety; the substantive arguments are numbered and provided in bold with BLM responses following.

<sup>6</sup> The Notice contains a memorandum of general sale information, the final parcel list, and the final stipulations.

<sup>7</sup> Additional parcels were deferred bringing the total offered sale parcels to 42 encompassing 64,129.97 acres. See BLM NVSO, *Notice of Competitive Oil and Gas Lease Sale for September 9, 2014* (June 5, 2014, as amended July 30, 2014), a copy is located at [http://www.blm.gov/nv/st/en/prog/minerals/leasable\\_minerals/oil\\_gas/oil\\_and\\_gas\\_leasing.html](http://www.blm.gov/nv/st/en/prog/minerals/leasable_minerals/oil_gas/oil_and_gas_leasing.html).

**I. The negative cumulative effects to commence drilling on public lands could far outweigh any oil/gas production benefits.**

BLM Response:

Comment Noted. Pursuant to Section 302 of the Federal Land Policy and Management Act of 1976 (FLPMA), [43 U.S.C. 1732] (a), "*The Secretary shall manage the public lands under principles of multiple use and sustained yield, in accordance with the land use plans developed by him under Section 202 of this Act when they are available, except that where a tract of such public land has been dedicated to specific uses according to any other provisions of law it shall be managed in accordance with such law.*" Leasing is authorized under the Mineral Leasing Act of 1920, as amended, and modified by subsequent legislation, and regulations found at 43 CFR part 3100.

Oil and gas leasing is recognized as an acceptable use of the public lands under the FLPMA. BLM authority for leasing public mineral estate for the development of energy resources, including oil and gas, is listed in 43 CFR 3160.0-3. Site specific NEPA would be conducted for future exploration or drilling proposals on lease parcels. Stipulations, Conditions of Approval (COA), avoidance, Best Management Practices (BMPs), and mitigation would be applied to minimize effects to resources.

In conclusion, BLM is mandated to manage public lands for multiple use and sustained yield. Therefore, the Carter allegation has been considered, found to be without merit, and is dismissed.

**II. Economic- The downside of economic expansion is increased population and increased pressure on finite resources, such as water, recreation, open space, and demands on government resources. Any economic benefit would be short lived and ensure to the benefit of few private companies.**

BLM Response:

Leasing, exploration, and development of oil and gas resources generate revenue to the Federal, state, and local governments. Exploration and development also generate economic activity in the private sector, including:

- capital investment;
- the purchase of operational supplies such as lubricating oils and drill bits for drill rigs;
- payment of employees in the many disparate aspects of leasing and exploration;
- those who handle permitting and land ownerships issues;
- those who handle the financing and payroll;
- the regulatory agency employees who regulate such activities;
- the on-the-ground employees who actually perform the exploration work; and
- the geologists who interpret the information received and advise on future exploration work.

Oil production from federal lands results in a 12.5% production royalty payment to the federal government. Fifty percent of that amount is provided to the state government. Taxes are paid to government in a variety of forms including income and property taxes by both the oil production operators and their employees. The additional economic activity and employment results in a trickle-down effect, supporting employment and economic activity in other sectors of the economy including housing, retail, services, and government.

In conclusion, the BLM stated that leasing, exploration, and development of oil and gas generate revenue to the Federal, state, and local governments due to direct employment, taxes and royalties. Therefore, the Carter allegation has been considered, found to be without merit, and is dismissed.

**III. Native American Cultural Sites- Less than 15% of the entire Elko District has been inventoried for Cultural Resources as of December 2013. The District contains over 17,700 known prehistoric-era and historic-era archeological sites. Most of the locations for the oil/gas Sale have not been inventoried.**

BLM Response:

The Sale does not authorize any ground disturbance; therefore, it has no direct effect to cultural resources. As directed by law, cultural resources inventories are conducted for any federal undertaking prior to surface disturbance, and adverse effects to historic properties avoided or mitigated as appropriate. Avoidance through project redesign is the preferred method of mitigation; however, when avoidance is not feasible, data recovery or other forms of mitigation are implemented prior to ground-disturbing activities.

Unavoidable adverse effects to historic properties would be addressed through mitigation in accordance with the appropriate processes and developed in consultation with the Nevada State Historic Preservation Office (SHPO). In addition, any previously unknown National Register of Historic Places (NRHP)-eligible sites potentially discovered during project activities would be mitigated in accordance with the NRHP and BLM rules and regulations in consultation with the Nevada SHPO. Therefore, proposed projects arising from the Sale are not expected to cumulatively contribute to direct effects to historic properties. However, if data recovery is necessary to mitigate unavoidable adverse effects of leasing to historic properties, the process would likely recover a substantial amount of data.

If exploration and development were later approved, the site might be destroyed by the undertaking thus preventing future opportunities for scientific research, preservation, or public appreciation. Over time, oil and gas production activities likely represent a cumulative loss of cultural resources.

The BLM concluded that leasing does not cause a direct effect to cultural resources. Future exploration proposals would be analyzed for impacts to cultural resources. Project redesign or avoidance would be utilized where possible and mitigation utilized where avoidance is not possible. Therefore, the Carter allegation has been considered, found to be without merit, and is dismissed.

- IV. Water- A small portion of precipitation that falls within the affected sub-basin infiltrates into the ground and resurfaces at springs ... as close as two miles of the proposed lease parcels. These waters are crucial to wildlife and livestock herds. A large portion of water diverted from springs is consumed directly by riparian vegetation and provides livestock and wildlife with forage and habitat, which depend on these for life-sustaining drinking water.**

BLM Response:

The sale of parcels and issuance of oil and gas leases is strictly an administrative action. The act of offering, selling, and issuing federal oil and gas leases does not produce impacts to water quality and surface water. On-the-ground impacts do not have the potential to occur until a lessee applies for and receives approval to drill on the lease.

There is one stream within one mile of the proposed lease sale parcels. Approximately 35 miles of a stream is within two miles of these parcels. Neither stream meets water quality criteria established by Nevada Department of Environmental Protection.

Protection of water resources would be accomplished through implementation of BMPs along with specific restrictions that may be applied to exploration and development of individual parcels. Parcels with sensitive water resources were identified in the EA (Table 2-1) and stipulations were attached to mitigate any known environmental or resource conflicts that may occur on a given lease parcel. For example, lessees may be required to locate facilities a certain distance from streams or off of the 100-year floodplain. These restrictions will be implemented on an individual parcel basis and will serve as a condition of approval for exploration and development.

In conclusion, the BLM notes that the sale of parcels and issuance of oil and gas leases is strictly an administrative action and does not produce impacts to water quality and surface water. Site specific NEPA would be conducted for future exploration or drilling proposals on lease parcels. Stipulations, COA, and BMPs would be applied to minimize effects to ground and surface water. Therefore, the Carter allegation has been considered, found to be without merit, and is dismissed.

- V. Contamination- If contamination of freshwater aquifers occurs from oil and gas development, changes in groundwater quality could impact springs and residential wells. Direct impact would be shortly after the start of construction activities, however, stabilization of soil to prevent erosion can take years, if ever. Impacts to groundwater would be less evident and occur on a longer time scale. Spills or produced fluids could result in contamination of the soil and impact surface and groundwater resources in the long term.**

BLM Response:

The sale of parcels and issuance of oil and gas leases is strictly an administrative action. The act of offering, selling, and issuing federal oil and gas leases does not produce impacts to water quality and surface water. On-the-ground impacts do not have the potential to occur until a lessee applies for and receives approval for exploration or drilling on the lease.

Oil and gas wells are cased and cemented at a depth below all usable water zones; consequently impacts to water quality at springs and residential wells are not expected.

Surface erosion would be greatest during the construction of a well and would be controlled through integrated measures, BMPs, and appropriate mitigation measures.

No source water protection areas will be affected by the proposed action as there are none within the lease parcels. One parcel was removed due to its proximity to several drinking water source water protection areas associated with the Spring Creek Community.

In conclusion, the BLM determined that the sale of parcels and issuance of oil and gas leases is strictly an administrative action and does not produce impacts to water quality and surface water. Site specific NEPA would be conducted for future exploration or drilling proposals on lease parcels. Stipulations, COA, and BMPs would be applied to minimize effects to ground and surface water. No source water protection areas will be affected by the proposed action as there are none within the lease parcels. Therefore, the Carter allegation has been considered, found to be without merit, and is dismissed.

**VI. Use of Chemicals- Currently water used to drill one well ranges between 1 and 6 million gallons. In fracturing a single well, companies have estimated that they used a ratio of 0.5% hydraulic chemical fluid mix to 1.5 gallons of water. That translates to a minimum of 5,000 gallons of chemicals into one well for every 1.5 gallons of water used to fracture it.**

BLM Response:

Comment Noted: The sale of parcels and issuance of oil and gas leases is strictly an administrative action. The act of offering, selling, and issuing federal oil and gas leases does not produce the potential for impacts until a lessee applies for and receives approval for exploration or drilling on the lease.

Not all wells resulting from an Application for Permit to Drill will employ fracturing and water consumption will be temporary. Oil and gas wells are cased and cemented at a depth below all usable water zones; consequently impacts to water quality at springs and residential wells are not expected.

After leasing, authorization of the proposed projects would require full compliance with local, state, and federal directives and stipulations that relate to surface and groundwater protection.

Proposed Federal and Nevada regulations address the use and reporting of hydraulic fracturing chemicals.

In conclusion, the BLM concludes that the sale of parcels and issuance of oil and gas leases is strictly an administrative action and does not produce impacts to water quality and surface water. Site specific NEPA would be conducted for future exploration or drilling proposals on lease parcels. Stipulations, COA, and BMPs would be applied to minimize effects to ground and surface water. No source water protection areas will be affected by the proposed action as there are none within the lease parcels. Future work would require full compliance with local, state, and federal directives. Therefore, the Carter allegation has been considered, found to be without merit, and is dismissed.

**VII. Seismic Development- Fluid injection associated with routine or hydraulic fracturing has the potential to induce seismic activity and Nevada is the 3<sup>rd</sup> most tectonically active State. Since 1850 there have been 63 earthquakes over 5.5 magnitude.**

BLM Response:

Comment noted. Fluid injection either associated with normal oil and gas development and production or associated with hydraulic fracturing has the potential to induce seismic activity.

Nevada is the third most tectonically active state in the union. Since the 1850s, there have been 63 earthquakes with a magnitude greater than 5.5. Geologic mapping and 2-D and 3-D seismic data can locate faults within the project boundary but current science may not be able to differentiate a "natural" earthquake in this tectonically active region as opposed to those induced by fluid injection. Well stimulation has been used in Nevada for years, however, Nevada Division of Minerals states that the first true high pressure hydraulic fracturing to occur in Nevada was authorized and completed in June 2014 (Perry, 2014 personal communication). No earthquakes were detected from this action. Any destructive earthquake has the potential to induce liquefaction in saturated soils and to cause landslides. Modern buildings in Nevada are built to code and if property owners practice earthquake preparedness, damage would be kept to a minimum.

In conclusion, the BLM implied that because Nevada is tectonically active, engineering code requires that modern buildings be designed and constructed for this higher level of seismic activity. Property owners are encouraged to practice earthquake preparedness, thus in the unlikely event that fluid injection or hydraulic fracturing were to induce earthquake activity, damage should be kept to a minimum. If an oil field exhibits an increase in seismic activity, data shows that injection wells are usually the cause. Any injection wells developed will follow state protocols, including being located away from known faults. The first well to be hydraulically fractured in Nevada in June 2014 did not generate any earthquakes of a magnitude to be felt by people. Therefore, the Carter allegation has been considered, found to be without merit, and is dismissed.

**VIII. Candidates: Threatened and Endangered Species-** There is PPH and PGH located within these proposed parcels. Some PPH identified as having the highest conservation value to include breeding, nesting, brood-rearing, and winter concentration areas. These areas are being analyzed in the respective NEPA documents. 34 lease parcels are within wild horse Herd Management Areas. If parcels are developed in the future, site-specific mitigation measures and BMPs would be attached as COAs and would be analyzed in a site-specific NEPA analysis.

BLM Response:

Initial leasing of oil and gas parcels will not have a direct effect on special status species, but surface disturbing activities of oil/gas exploration and facility construction of lease parcels have a possibility of occurring within the vicinity of resident special status species populations. Stipulations are in place to prevent or minimize adverse effects to special status species that must be complied with as a term of lease purchase. An inventory for special status species is required on leased parcels in known or potential habitat for threatened, endangered, or candidate species. If BLM determines an action "may affect" a listed threatened or endangered species Section 7 Consultation with the USFWS will be initiated (EKDO RMP Record of Decision).

The application of stipulations to leasing activities are expected to negate displacement of special status species, long-term changes to habitat quality and modifications in population distribution and abundance, particularly in species with restricted distribution and specific habitat requirements. The BLM will require modifications on any proposed action that is likely to adversely affect a special status species or result in modification of its habitat. As such, it is unlikely that any special status species would be adversely affected.

Parcels or portions of parcels within a four mile radius of active sage grouse leks and parcels located on lands containing Greater Sage Grouse PPH and PGH have been deferred from the Sale. These deferred parcels will not be offered for sale until the Record of Decision is signed for the Nevada and Northeastern California Greater Sage Grouse EIS.

Indirect impacts to wild horses could include disturbance due to increased human activity. These impacts would likely be short term in nature, and would consist of wild horses moving out of the area or changing movement patterns. If parcels were developed in the future, site-specific mitigation measures and BMPs would be attached as COA for each proposed activity, which would be analyzed in a site-site-specific NEPA analysis. BMPs, along with specific restrictions, would be implemented to minimize negative impacts to wild horses.

In conclusion, all parcels or portions of parcels within a four mile radius of active sage grouse leks and parcels located on lands containing Greater Sage Grouse PPH and PGH have been deferred. Site specific NEPA would be conducted for future exploration or drilling proposals on lease parcels. Stipulations, COA, BMPs, and mitigation would be applied to minimize effects to wild horses and special status species, including sage grouse. Therefore, the Carter allegation has been considered, found to be without merit, and is dismissed.

- IX. Cumulative Effects-** In the Affected Environment section of the EA, there is a considerable portion of riparian/wetland resources in the Cumulative Effects Study Area (CESA) that are non-functional or at risk and as such, it could be inferred that riparian/wetland resources have already sustained substantive cumulative effect. These impacts would continue to occur under the No Action Alternative. Subsequent development could increase impacts, specifically development would likely result in negative impacts to riparian/wetland resources. These cumulative impacts would continue to occur under the proposed action.

BLM Response:

Results of lotic and lentic proper functioning condition (PFC) assessments indicate that although some improvement has been accomplished in the past 15 years, many acres of riparian area are rated as being in poor condition. A BLM summary of lotic PFC assessments for the Elko District indicated that 60% of stream miles assessed between 2000 and 2012 were rated in PFC or Functional at Risk (FAR) with upward trend. Results in the affected sub-basins and streams in and near the proposed parcels are similar. BLM's lentic assessment database indicates that of the 29 assessments completed in and near (within two miles) the proposed lease parcels, eight were rated as FAR with downward trend, one was rated as FAR with upward trend, three were rated as FAR with no apparent trend, seven were rated as non-functional and 10 were rated as being in PFC.

The Proposed Action would not result in any direct incremental increase in cumulative impacts to riparian/wetland resources, but subsequent development could increase impacts. Specifically, future development would likely result in additional water diversion, and surface water quality could be affected by development, resulting in potential impacts to riparian and wetland resources. The incremental increase in these impacts is small when compared to the level of impacts that already exists in the sub-basins as described in the EA. These cumulative impacts would continue to occur under the Proposed Action and the no action alternatives.

In conclusion, BLM data indicate that 60% of stream miles assessed between 2000 and 2012 were rated in PFC or FAR with upward trend. Site specific NEPA would be conducted for future exploration or drilling proposals on lease parcels. Stipulations, COA, BMPs, and mitigation would be applied to minimize effects to riparian areas and wetlands. Therefore, the Carter allegation has been considered, found to be without merit, and is dismissed.

**DECISION**

To the extent that Carter has raised any allegations not specifically discussed herein, they have been considered and are found to be without merit. For this reason, and for those previously discussed, the Carter protest of the Sale is dismissed and all 42 parcels were offered for sale on September 9, 2014.

## APPEAL INFORMATION

This decision may be appealed to the Interior Board of Land Appeals, Office of the Secretary, in accordance with the regulations contained in 43 CFR, Part 4 and Form 1842-1 (enclosed). If an appeal is taken, a notice of appeal and/or request for stay must be filed in writing, on paper, in this office, either by mail or personal delivery within 30 days after the date of service. Notices of appeal and/or request for stay that are electronically transmitted (e.g., email, facsimile, or social media) will not be accepted as timely filed. The notice of appeal is considered filed as of the date our office receives the hard copy and places our BLM date stamp on the document.

If you wish to file a petition pursuant to regulation 43 CFR 4.21 (58 FR 4939, January 19, 1993) (request) for a stay (suspension) of the effectiveness of this decision during the time that your appeal is being reviewed by the Board, the petition for a stay must accompany your notice of appeal. A petition for a stay is required to show sufficient justification based on the standards listed below. Copies of the notice of appeal and petition for a stay must also be submitted to each party named in this decision and to the Interior Board of Land Appeals and to the appropriate office of the Solicitor (*see* 43 CFR 4.413) at the same time the original documents are filed with this office. If you request a stay, you have the burden of proof to demonstrate that a stay should be granted.

### Standards for Obtaining a Stay

Except as otherwise provided by law or other pertinent regulation, a petition for a stay of a decision pending appeal shall show sufficient justification based on the following standards:

- (1) The relative harm to the parties if the stay is granted or denied,
- (2) The likelihood of the appellant's success on the merits,
- (3) The likelihood of immediate and irreparable harm if the stay is not granted, and
- (4) Whether the public interest favors granting the stay.

If you have any questions regarding this decision, please contact Mike Herder, Acting Deputy State Director, Minerals Division, at (775) 861-6585.



Amy Lueders  
State Director

**Enclosures:**

- 1- Susan Carter protest letter
- 2- Final EA
- 3- Form 1842-1

**cc:**

WO310 (S. Wells)  
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