

Nos. 20-1530, 20-1531, 20-1778, 20-1780

IN THE
Supreme Court of the United States

WEST VIRGINIA, ET AL.

v.

ENVIRONMENTAL PROTECTION AGENCY, ET AL.

THE NORTH AMERICAN COAL CORPORATION

v.

ENVIRONMENTAL PROTECTION AGENCY, ET AL.

WESTMORELAND MINING HOLDINGS LLC

v.

ENVIRONMENTAL PROTECTION AGENCY, ET AL.

NORTH DAKOTA

v.

ENVIRONMENTAL PROTECTION AGENCY, ET AL.

CERTIFICATE OF COMPLIANCE

As required by Supreme Court Rule 33.1(h), I hereby certify that the Brief for Petitioner The North American Coal Corporation in *West Virginia v. Environmental Protection Agency*, No. 20-1530, *The North American Coal Corporation v. Environmental Protection Agency*, No. 20-1531, *Westmoreland Mining Holdings LLC v. Environmental Protection Agency*, No. 20-1778, and *North Dakota v. Environmental Protection Agency*, No. 20-1780, complies with the word limitations, as it contains 12,978 words.

I declare under penalty of perjury that the foregoing is true and correct.

Date: December 13, 2021



Yaakov M. Roth