



**CERTIFICATE OF COMPLIANCE**

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

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.

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As required by Supreme Court Rule 33.1(h), I certify that the Brief of Amicus Curiae the Buckeye Institute in Support of Petitioners contains 2,829 words, excluding the parts of the Brief that are exempted by Supreme Court Rule 33.1(d).

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

Executed on December 20, 2021.

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Emily Mullins

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Sworn to and subscribed before me by said Affiant  
on the date designated below.

Date: December 20, 2021

John D. Gallagher  
Notary Public

[seal]



**JOHN D. GALLAGHER**  
Notary Public, State of Ohio  
My Commission Expires  
February 14, 2023