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 Reply 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 5,993 words.

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

Yaakov M. Roth

Date: February 17, 2022