

No. \_\_\_\_

**In the Supreme Court of the United States**

AMERICAN EXPLORATION & MINING ASSOCIATION,

*Petitioner,*

v.

RYAN ZINKE, ET AL.,


*Respondent(s).*

**CERTIFICATE OF COMPLIANCE**

As required by Supreme Court Rule 33.1(h), I certify that the Petition for Writ of Certiorari contains 8,972 words, excluding the parts of the document 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 March 8, 2018.

  
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