

No. 17-1290

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

AMERICAN EXPLORATION & MINING ASSOCIATION,  
Petitioner,  
v.  
RYAN ZINKE, SECRETARY OF THE INTERIOR, ET AL.,  
Respondents.

**CERTIFICATE OF COMPLIANCE**

As required by Supreme Court Rule 33.1(h), I certify that Petitioner's Reply Brief to Respondents' Briefs in Opposition contains 1,773 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 August 13, 2018.

/s/ William Perry Pendley  
WILLIAM PERRY PENDLEY  
Counsel of Record  
DAVID C. MCDONALD  
Mountain States Legal Foundation  
2596 South Lewis Way  
Lakewood, Colorado 80227  
(303)292-2021  
wppendley@mountainstateslegal.com  
dmcdonald@mountainstateslegal.com

Counsel for Petitioner