

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

---

ATLANTIC RICHFIELD COMPANY,

*Petitioner,*

v.

GREGORY A. CHRISTIAN, et al.,

*Respondents.*

---

**On Writ of Certiorari  
to the Supreme Court of Montana**

---

**CERTIFICATE OF COMPLIANCE**

---

As required by Supreme Court Rule 33.1(h), I certify that the BRIEF AMICUS CURIAE OF PACIFIC LEGAL FOUNDATION AND PROPERTY AND ENVIRONMENT RESEARCH CENTER IN SUPPORT OF RESPONDENTS contains 5,027 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 October 18, 2019.



---

JONATHAN WOOD

*Counsel of Record*

Pacific Legal Foundation

3100 Clarendon Blvd., Suite 610

Arlington, Virginia 22201

Telephone: (202) 888-6881

JWood@pacificlegal.org

*Counsel for Amicus Curiae*

*Pacific Legal Foundation*