



**CERTIFICATE OF COMPLIANCE**

No. 20-1195

KANSAS NATURAL RESOURCE COALITION,

*Petitioner,*

v.

UNITED STATES DEPARTMENT OF INTERIOR, ET AL.,

*Respondents.*

As required by Supreme Court Rule 33.1(h), I certify that the Brief of *Amicus Curiae* the Buckeye Institute in Support of Plaintiff's Petition for Writ of Certiorari contains 3,504 words, excluding the parts of the Petition 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 31, 2021.

Emily Mullins

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

Date: March 31, 2021

John D. Gallagher

Notary Public

[seal]



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