

No. 20-1778

WESTMORELAND MINING HOLDINGS LLC,  
*Petitioner,*

*v.*

ENVIRONMENTAL PROTECTION AGENCY, ET AL.,  
*Respondents.*

**CERTIFICATE OF COMPLIANCE**

As required by Supreme Court Rule 33.1(h), I certify that Brief of the Cato Institute as *Amicus Curiae* in Support of Petitioner contains 2,171 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

/s/ Ilya Shapiro  
*Counsel of Record*