

No. 24-1296

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

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MCKENZIE COUNTY, NORTH DAKOTA,  
*Petitioner,*

v.

UNITED STATES OF AMERICA AND THE DEPARTMENT OF  
THE INTERIOR,  
*Respondents.*

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*On Petition for Writ of Certiorari  
to the United States Court of Appeals  
for the Eighth Circuit*

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**PETITIONER'S REPLY BRIEF  
CERTIFICATE OF COMPLIANCE**

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As required by Supreme Court Rule 33.1(h), I certify that the Petition for Writ of Certiorari contains 2,997 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 October 14, 2025.

*/s/ Danielle R. Bettencourt*

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