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**UNITED STATES DISTRICT
COURT FOR THE DISTRICT
OF WYOMING**

STATE OF WYOMING and)
STATE OF MONTANA)
)
Petitioners,)
)
v.)
)
UNITED STATES DEPARTMENT OF)
THE INTERIOR; SALLY JEWELL, in her)
official capacity as Secretary of the Interior;)
UNITED STATES BUREAU OF LAND)
MANAGEMENT; and NEIL KORNZE, in)
his official capacity as Director of the)
Bureau of Land Management,)
)
Respondents.)

Case No. 16-cv-00285-SWS

**STATE OF NORTH DAKOTA'S UNOPPOSED
MOTION TO INTERVENE AS PETITIONER**

Pursuant to Federal Rule of Civil Procedure 24(a)(2) and Local Rule 83.6(e) of this Court, the State of North Dakota (“North Dakota”) moves the Court for leave to intervene in this matter as a petitioner-intervenor as of right or, in the alternative, permissively. In support of this motion, North Dakota has filed a memorandum of law and a proposed petition for review.

Counsel for North Dakota has conferred with counsel for Petitioners State of Wyoming and State of Montana, and they do not oppose North Dakota’s intervention motion. Counsel for Federal Respondents has not yet entered an appearance in this case. In light of the significant interests North Dakota has at stake in this litigation, North Dakota urges the Court to grant its motion to intervene as a petitioner-intervenor.

Respectfully submitted this 23rd day of November, 2016.

/s/ Paul M. Seby

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**ATTORNEYS FOR PROPOSED PETITIONER-
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of (1) State of North Dakota's Unopposed Motion to Intervene as Petitioner; (2) Memorandum in Support of State of North Dakota's Unopposed Motion to Intervene as Petitioner; and (3) Declarations of Lynn Helms and L. David Glatt in Support of State of North Dakota's Motion to Intervene as Petitioner; and (4) Proposed Petition for Review were served via CM/ECF to the parties listed below on November 23, 2016.

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