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*Attorneys for Proposed Petitioner-Intervenor
State of North Dakota*

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

STATE OF WYOMING,)	
)	
Petitioner,)	Case No. 2:15-cv-00043-SWS
)	
v.)	
)	
UNITED STATES DEPARTMENT OF)	
THE INTERIOR; SALLY JEWELL,)	
in her capacity as Secretary of the)	
Interior; BUREAU OF LAND)	
MANAGEMENT; and NEIL)	
KORNZE, in his capacity as Director,)	
Bureau of Land Management,)	
)	
Respondents.)	
)	

**STATE OF NORTH DAKOTA’S UNOPPOSED
MOTION TO INTERVENE AS A 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 Petitioner State of Wyoming. Counsel for the State of Wyoming does 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 1st day of April, 2015.

/s/ Andrew C. Emrich

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**ATTORNEYS FOR PROPOSED
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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) Declaration of Lynn Helms in Support of State of North Dakota's Motion to Intervene as Petitioner were served via CM/ECF to the parties listed below on April 1, 2015.

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