IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

WILDEARTH GUARDIANS, et al.,

Plaintiffs,

v.

BERNHARDT, et al.,

Federal Defendants,

and

WESTERN ENERGY ALLIANCE, PETROLEUM ASSOCIATION OF WYOMING, et al.

Defendant-Intervenors.

Case No. 1:16-cv-01724-RC

WESTERN ENERGY ALLIANCE'S RESPONSE TO MOTION TO AMEND JUDGMENT

Western Energy Alliance and Petroleum Association of Wyoming (collectively, the "Alliance") oppose Plaintiffs' June 4, 2019 Motion to Amend the Court's May 29, 2019 Minute Order (Plaintiffs' Motion). [Doc. 108]. In support of their opposition, Alliance adopts the reasoning and argument provided by Federal Defendants in their Opposition to the Motion to Amend [Doc. 110]. Plaintiffs motion is procedurally defective, and without a proper legal or factual basis.

Thus, Alliance respectfully requests the Court deny Plaintiffs' Motion for the reasons stated in Federal Defendants' Opposition.

Respectfully submitted this 18th day of June, 2019.

/s/ Bret Sumner

Bret Sumner (DC Bar # 464494) bsumner@bwenergylaw.com Jim Martin, *Pro Hac Vice* jmartin@bwenergylaw.com Michael Cross, *Pro Hac Vice* mcross@bwenergylaw.com BEATTY & WOZNIAK, P.C. 216 Sixteenth St., Suite 1100 Denver, CO 80202-5115 Telephone: 303-407-4499 Fax: 800-886-6566

Attorneys for Defendant-Intervenors Western Energy Alliance and Petroleum Association of Wyoming

CERTIFICATE OF SERVICE

I hereby certify that on the 18th day of June, 2019, I caused a true and correct copy of the foregoing to be filed with the Court electronically through the CM/ECF system, which will serve the foregoing by electronic means on all counsel of record in this case.

/s/ Bret Sumner