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*Counsel for TransCanada Keystone Pipeline, LP and TC Energy Corporation*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
GREAT FALLS DIVISION**

INDIGENOUS ENVIRONMENTAL  
NETWORK and NORTH COAST RIVERS  
ALLIANCE,

Plaintiffs,

vs.

PRESIDENT DONALD J. TRUMP,  
UNITED STATES DEPARTMENT OF  
STATE; MICHAEL R. POMPEO, in his  
official capacity as U.S. Secretary of State;  
UNITED STATES ARMY CORPS OF  
ENGINEERS; LT. GENERAL TODD T.  
SEMONITE, Commanding General and  
Chief of Engineers; UNITED STATES FISH  
AND WILDLIFE SERVICE, a federal  
agency; GREG SHEEHAN, in his official  
capacity as Acting Director of the U.S. Fish  
and Wildlife Service; UNITED STATES  
BUREAU OF LAND MANAGEMENT, and  
DAVID BERNHARDT, in his official

CV 19-28-GF-BMM

**TRANSCANADA  
KEYSTONE PIPELINE, LP  
AND TC ENERGY  
CORPORATION'S  
SUPPLEMENTAL STATUS  
REPORT**

capacity as Acting U.S. Secretary of the Interior,

Defendants,

TRANSCANADA KEYSTONE PIPELINE, LP, a Delaware limited partnership, and TC ENERGY CORPORATION, a Canadian Public company,

Defendant-Intervenors.

On September 20, 2019, Defendants TransCanada Keystone Pipeline, LP and TC Energy Corporation (TC Energy) filed a status report with this Court, reporting on its intentions to take certain steps with regard to specific, pre-construction activities on private lands. (Doc. 62). Subsequently, TC Energy informed counsel that it is continuing to assess the appropriate timeline for conducting preconstruction activities. With the exception of weed eradication, which is already complete, and the orderly winddown of certain road upgrade work, preconstruction work will not occur until, at the earliest, after the hearing scheduled for October 9, 2019. TC Energy will further advise the Court of its plans at the October 9 hearing.

DATED this 3rd day of October, 2019,

CROWLEY FLECK PLLP

/s/ Jeffery J. Oven  
Jeffery J. Oven  
Mark L. Stermitz

SIDLEY AUSTIN LLP

/s/ Peter R. Steenland, Jr.  
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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was served today via the Court's CM/ECF system on all counsel of record.

/s/ Jeffery J. Oven