

Associations' members will be directly and adversely affected if Plaintiffs were to obtain the requested relief in this matter. The Associations meet the requirements of Federal Rule of Civil Procedure 24(a) to intervene as of right in this matter because (1) this motion is timely, (2) they have interests relating to the property or transaction at issue in this case, (3) the resolution of this matter may affect their ability to protect those interests, and (4) their interests are not adequately represented by existing parties. The Associations have conferred with the parties in this matter. The Federal Defendants take no position. Plaintiffs Center for Biological Diversity, *et al.*, do not oppose this motion provided that the Associations submit joint briefs and agree to staggered briefing as described in the accompanying memorandum. The Intervenor-Defendants admitted to the case by the Court's orders of August, 31, 2015 and November 16, 2015 support this motion.

For these reasons, the Associations request that the Court grant them permission to intervene as of right in this matter. In the alternative, the Associations request that the Court grant them permissive intervention under Rule 24(b).

Respectfully submitted,

/s/John C. Martin

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Timber Professionals Association and National
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*and Proposed Intervenor-Defendants
American Exploration & Production Council,
American Farm Bureau Federation, American
Petroleum Institute, Chamber of Commerce of
the United States of America, Independent
Petroleum Association of America, Marcellus
Shale Coalition, National Association of
Homebuilders of the United States, Ohio Oil
and Gas Association, Pennsylvania
Independent Oil & Gas Association, and West
Virginia Oil and Natural Gas Association*

CERTIFICATE OF SERVICE

I hereby certify that on June 7, 2016, I electronically transmitted the attached document to the Clerk of the Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to all ECF registrants.

Respectfully submitted,

/s/John C. Martin

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