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**IN THE UNITED STATES COURT OF APPEALS
FOR THE NINTH CIRCUIT**

ALASKA WILDERNESS LEAGUE, CENTER FOR) No.
BIOLOGICAL DIVERSITY, FRIENDS OF THE)
EARTH, NATIONAL AUDUBON SOCIETY,)
NATURAL RESOURCES DEFENSE COUNCIL,)
NORTHERN ALASKA ENVIRONMENTAL)
CENTER, PACIFIC ENVIRONMENT, RESISTING)
ENVIRONMENTAL DESTRUCTION ON)
INDIGENOUS LANDS (REDOIL), SIERRA CLUB,)
and THE WILDERNESS SOCIETY,)

Petitioners,)

v.)

SALLY JEWELL, Secretary of the Interior, and)
BUREAU OF OCEAN ENERGY MANAGEMENT,)

Respondents.)

PETITION FOR REVIEW

Pursuant to 43 U.S.C. § 1349(c)(2) and Federal Rule of Appellate Procedure 15, Alaska Wilderness League, Center for Biological Diversity, Friends of the Earth, National Audubon Society, Natural Resources Defense Council, Northern Alaska Environmental Center, Pacific Environment, Resisting Environmental Destruction On Indigenous Lands (REDOIL), Sierra Club, and The Wilderness Society (Petitioners) hereby petition this Court to review the May 11, 2015, decision of the Secretary of Interior, acting through the Bureau of Ocean Energy Management (BOEM), to approve an offshore oil exploration plan submitted by Shell Gulf of Mexico Inc. for the Chukchi Sea in the Arctic Ocean offshore Alaska. *See Attachments 1-3.*

Petitioners are conservation and Alaska Native groups whose members use and enjoy the affected area for recreational, aesthetic, or scientific purposes or whose members depend on the ecosystems and wildlife of the Arctic for subsistence, cultural, and traditional uses. Petitioners are affected adversely and aggrieved by the decision to approve Shell Gulf of Mexico Inc.'s exploration plan for the Chukchi Sea. In approving the plan, BOEM violated the Outer Continental Shelf Lands Act (OCSLA), 43 U.S.C. §§ 1331-1356, 1866, and the National Environmental Policy Act, 42 U.S.C. §§ 4321-4370.

This Court has exclusive jurisdiction over the petition under OCSLA, 43 U.S.C. § 1349(c)(2). This petition is timely filed within 60 days after the May 11, 2015, decision. *See* 43 U.S.C. § 1349(c)(3).

Respectfully submitted this 2nd day of June, 2015.

s/ Erik Grafe

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