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Attorney for Petitioners

UNITED STATES COURT OF APPEALS
FOR THE NINTH CIRCUIT

ALASKA ESKIMO WHALING
COMMISSION AND INUPIAT
COMMUNITY OF THE ARCTIC
SLOPE,

Petitioners,

v.

KEN SALAZAR, Secretary of the Interior,
and MINERALS MANAGEMENT
SERVICE,

Respondents.

No.:

PETITION FOR REVIEW

Pursuant to 43 U.S.C. § 1349(c)(2) and Federal Rule of Appellate Procedure 15, the Alaska Eskimo Whaling Commission (AEWC) and the Inupiat Community of the Arctic Slope (ICAS) hereby petition this Court to review the October 16, 2009 decision of the Secretary of the Interior, acting through the Minerals Management Service (MMS), to approve the 2010

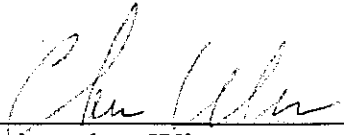
Outer Continental Shelf Lease Exploration Plan Camden Bay submitted by Shell Offshore Inc. Attachment 1.

Petitioner AEWC is a non-profit organization representing subsistence whaling captains from North Slope communities. Petitioner ICAS is a federally recognized sovereign tribal government organized pursuant to the Indian Reorganization Act of 1934. Petitioners, their members and the communities they represent depend on the resources of the Beaufort Sea to continue the subsistence lifestyle that has sustained their families and formed the basis for their culture and traditions since time immemorial. Petitioners are aggrieved by the decision, which approves oil drilling in the Beaufort Sea, because the agency failed adequately to consider potential impacts of the decision on the wildlife of the Arctic ecosystem, including bowhead whales and other marine mammals, as well as air and water quality, in violation of the National Environmental Policy Act (NEPA), 42 U.S.C. §§ 4321-4370f and the Outer Continental Shelf Lands Act (OCSLA), 43 U.S.C. §§ 1331-1356.

This Court has exclusive jurisdiction over the Petition for Review under OCSLA, 43 U.S.C. § 1349(c)(2). This Petition for Review is timely filed within 60 days of the October 16, 2009 decision. *See* 43 U.S.C. 1349 § 1349(c)(3).

DATED this 14th day of December, 2009.

Respectfully submitted,



Christopher Winter
CRAG LAW CENTER

*Attorney for Petitioners Alaska Eskimo
Whaling Commission and Inupiat
Community of the Arctic Slope*

PROOF OF SERVICE

I, Megan Hooker, certify that on December 14, 2009, I served true and correct copies of this PETITION FOR REVIEW, with attachment; CORPORATE DISCLOSURE STATEMENT; and PROOF OF SERVICE by overnight delivery on the following:

KEN SALAZAR, Secretary of the Interior
Department of Interior
1849 C Street, NW
Washington, DC 20240

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Department of Interior
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Megan Hooker
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