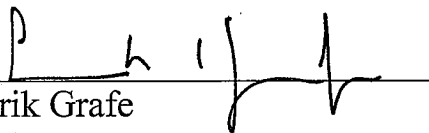


Pursuant to 43 U.S.C. § 1349(c)(2) and Federal Rule of Appellate Procedure 15, the Native Village of Point Hope, Alaska Wilderness League, Center for Biological Diversity, Defenders of Wildlife, National Audubon Society, Natural Resources Defense Council, Northern Alaska Environmental Center, Oceana, Ocean Conservancy, Pacific Environment, Resisting Environmental Destruction On Indigenous Lands (REDOIL), Sierra Club, and The Wilderness Society (Petitioners) hereby petition this Court to review the December 7, 2009 decision of the Secretary of Interior, acting through the Minerals Management Service (MMS), to approve an offshore oil exploration plan submitted by Shell Gulf of Mexico Inc. (Shell). *See Attachment 1.*

Petitioners are Alaska Native and conservation groups whose members depend on the ecosystems and wildlife of the Arctic for subsistence, cultural, and traditional uses or whose members use and enjoy the affected area for recreational, aesthetic, or scientific purposes. Petitioners are aggrieved by the decision, which approves oil drilling offshore Alaska in the Chukchi Sea, because MMS failed to consider adequately and address potential impacts of the decision on the sensitive Arctic ecosystem, subsistence activities, and wildlife in violation of Federal law, including the National Environmental Policy Act, 42 U.S.C. §§ 4321-4370, and the Outer Continental Shelf Lands Act (OCSLA), 43 U.S.C. §§ 1331-1356.

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 December 7, 2009 decision. *See* 43 U.S.C. § 1349(c)(3).

Respectfully submitted this 19th day of January, 2010.


Erik Grafe
Eric P. Jorgensen
EARTHJUSTICE

Attorneys for Petitioners

CERTIFICATE OF SERVICE

I, Sarah Saunders, hereby certify that on January 19, 2010, I served true and correct copies of the PETITION FOR REVIEW, with attachment, by USPS


Express Mail on each of the following:

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