

**IN THE UNITED STATES COURT OF APPEALS  
FOR THE DISTRICT OF COLUMBIA CIRCUIT**

**ARKANSAS LEAGUE OF GOOD  
NEIGHBORS,**

**Petitioner,**

**v.**

**UNITED STATES ENVIRONMENTAL  
PROTECTION AGENCY, and  
MICHAEL S. REGAN, in his official  
capacity as Administrator, United States  
Environmental Protection Agency,**

**Respondents.**

**No. 23-1211**

**PETITION FOR REVIEW**

Pursuant to Section 307(b)(1) of the Clean Air Act, 42 U.S.C. § 7607(b)(1), and Federal Rule of Appellate Procedure 15(a), Petitioner Arkansas League of Good Neighbors hereby petitions the United States Court of Appeals for the District of Columbia Circuit for review of the final action by Respondents United States Environmental Protection Agency and Administrator Michael S. Regan, entitled “Federal ‘Good Neighbor Plan’ for the 2015 Ozone National Ambient Air Quality Standards,” published at 88 Fed. Reg. 36,654 (June 6, 2023) (“Final Rule”), a copy of which is attached hereto.

This Court has jurisdiction over this Petition under 42 U.S.C. § 7607(b)(1). In the interest of avoiding disputes over venue in the regional circuits, Petitioner acquiesces to venue in this Court. *Tex. Mun. Power Agency v. EPA*, 89 F.3d 858, 867 (D.C. Cir. 1996) (“§ 307(b)(1) is a venue provision, the application of which can be waived”).

Dated: August 4, 2023

Kelly M. McQueen  
The McQueen Firm, PLLC  
7 Ken Circle  
Little Rock, AR 72207  
(501) 580-3291  
kelly@mcqueen.law  
kellymmcqueen@yahoo.com

Respectfully submitted,

/s/ Elbert Lin  
Elbert Lin  
Kevin S. Elliker  
David N. Goldman  
HUNTON ANDREWS KURTH LLP  
951 East Byrd Street, East Tower  
Richmond, VA 23219  
(804) 788-8200  
elin@HuntonAK.com  
kelliker@HuntonAK.com  
dgoldman@HuntonAK.com

F. William Brownell  
E. Carter Chandler Clements  
HUNTON ANDREWS KURTH LLP  
2200 Pennsylvania Avenue, N.W.  
Washington, DC 20037  
(202) 955-1500  
bbrownell@HuntonAK.com  
eclements@HuntonAK.com

*Counsel for Petitioner*  
*Arkansas League of Good Neighbors*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 4th day of August, 2023, I caused one copy of the foregoing Petition for Review to be served on each of the following by certified United States mail, return receipt requested:

The Honorable Michael S. Regan  
Administrator  
Office of the Administrator (1101A)  
United States Environmental Protection Agency  
1200 Pennsylvania Avenue, N.W.  
Washington, DC 20460

The Honorable Merrick Garland  
Attorney General of the United States  
United States Department of Justice  
950 Pennsylvania Avenue, N.W.  
Washington, DC 20530-0001

The Honorable Todd Sunhwaee Kim  
Assistant Attorney General  
Environmental and Natural Resources Division  
U.S. Department of Justice  
950 Pennsylvania Ave., N.W.  
Washington, DC 20530-0001

Correspondence Control Unit  
Office of General Counsel (2311)  
United States Environmental Protection Agency  
1200 Pennsylvania Avenue, N.W.  
Washington, DC 20460

/s/ Elbert Lin

Elbert Lin