

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

NATURAL RESOURCES DEFENSE)	
COUNCIL, INC.,)	
)	
Plaintiff)	Civil Action No. 08-1363 (RJL)
)	
-v.-)	
)	
UNITED STATES DEPARTMENT OF)	
STATE, et al.,)	
)	
Defendants)	
)	
TRANSCANADA KEYSTONE)	
PIPELINE, LP,)	
)	
Defendant-Intervenor)	

DECLARATION OF GINA TRUJILLO

I, Gina Trujillo, declare as follows:

1. I am over the age of eighteen years and suffer from no legal incapacity.

This declaration is based on my own personal knowledge, information, and belief.

2. I am the Director of Member Services and Member Development for the Natural Resources Defense Council ("NRDC"). I have held this position for over two years, and have worked in the membership department of NRDC for seventeen years.

3. My duties include supervising the preparation of materials that NRDC distributes to members and potential members. Those materials describe NRDC and identify its mission.

4. NRDC is a membership organization incorporated under the laws of the State of New York. It is recognized as a not-for-profit corporation under Section 501(c)(3) of the United States Internal Revenue Code.

5. When an individual becomes a member of NRDC, his or her current residential address is recorded in NRDC's membership database. When a member renews his or her membership or otherwise makes a contribution to NRDC, the database entry reflecting the member's residential address is verified or updated.

6. When a person becomes a member of NRDC, that person authorizes NRDC to take legal action on his or her behalf to protect the environment and public health.

7. NRDC currently has over 420,000 members nationwide. There are members in all 50 states and the District of Columbia. Over 19,000 NRDC members reside in Illinois, more than 2,900 live in Kansas, over 13,000 live in Texas, and more than 2,000 reside in Oklahoma.

8. NRDC's mission statement declares that "The Natural Resources Defense Council's purpose is to safeguard the Earth: its people, its plants and animals, and the natural systems on which all life depends." The mission statement goes on to declare that NRDC works "to restore the integrity of the elements that sustain life – air, land, and water – and to defend endangered natural places." NRDC's mission includes the prevention and mitigation of air and water pollution, harm to fish and wildlife, habitat destruction, and health threats posed by toxic chemicals in order to protect and maintain NRDC members' health and use and enjoyment of natural resources.

9. Consistent with its mission, NRDC has worked since its founding in 1970 to ensure that all federal agencies comply with the requirements of the National Environmental Policy Act (“NEPA”). NRDC relies on NEPA, among other vehicles, to develop information on environmental impacts that we share with our members. NRDC’s organizational interests include informing NRDC members and the public about air and water pollution (including greenhouse gases) that threatens their health and the natural environment, in addition to advocating for control of such pollution.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: October 16, 2008

/s/ Gina Trujillo
Gina Trujillo

CERTIFICATE OF SERVICE

I, Selena K. Kyle, hereby certify that on October 17, 2008, I served the foregoing document:

DECLARATION OF GINA TRUJILLO

on the following counsel via the Court's electronic filing system:

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I declare under penalty of perjury that the foregoing is true and correct.

Executed October 17, 2008:

/s/ Selena K. Kyle
Selena K. Kyle