

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLORADO

Civil Action No.

WILDGRASS OIL AND GAS COMMITTEE,

Plaintiff

v.

STATE OF COLORADO; JARED S. POLIS, in his official capacity as Governor of the State of Colorado; COLORADO OIL AND GAS CONSERVATION COMMISSION; and JEFFREY ROBBINS, in his official capacity as Acting Director of the Colorado Oil and Gas Conservation Commission,

Defendants.

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**MOTION FOR TEMPORARY RESTRAINING  
ORDER AND PRELIMINARY INJUNCTION**

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Pursuant to Fed. R. Civ. P. 65 and LCvR 65.1, Plaintiff the WILDGRASS OIL AND GAS COMMITTEE hereby moves the Court to issue a Temporary Restraining Order and Preliminary Injunction requiring Defendants to refrain from and enjoin the COGCC from (a) pooling any non-consenting owners minerals, and (b) allowing operators to proceed with gas and oil operations in drilling and spacing units containing non-consenting mineral owners, until the constitutionality of the Act is resolved.

In support of this motion, Plaintiff relies upon the attached memorandum of points and authorities. A proposed order is attached.

ORAL ARGUMENT REQUESTED.

Dated: January 23, 2019

Respectfully submitted,

By: /s/ Joseph A. Salazar  
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