

In The
Supreme Court of the United States

SUNCOR ENERGY (U.S.A.) INC., ET AL.,

Petitioners,

v.

COUNTY COMMISSIONERS OF BOULDER COUNTY,

ET AL.,

Respondents.

On Writ of Certiorari to the Supreme Court of Colorado

CERTIFICATE OF COMPLIANCE WITH WORD LIMITATIONS

Pursuant to Supreme Court Rule 33.1(h), I hereby certify that the Brief of Professor Saikrishna B. Prakash as *Amicus Curiae* in Support of Petitioners contains 7,477 words, excluding parts of the document exempted Rule 33.1(d). I declare under penalty of perjury that the foregoing is true and correct.

Executed May 21, 2026.

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