

INTERNATIONAL COURT OF JUSTICE

**CASE CONCERNING
MARITIME DELIMITATION IN THE INDIAN OCEAN**

**SOMALIA
v.
KENYA**

MEMORIAL OF SOMALIA

VOLUME II

13 JULY 2015

VOLUME II

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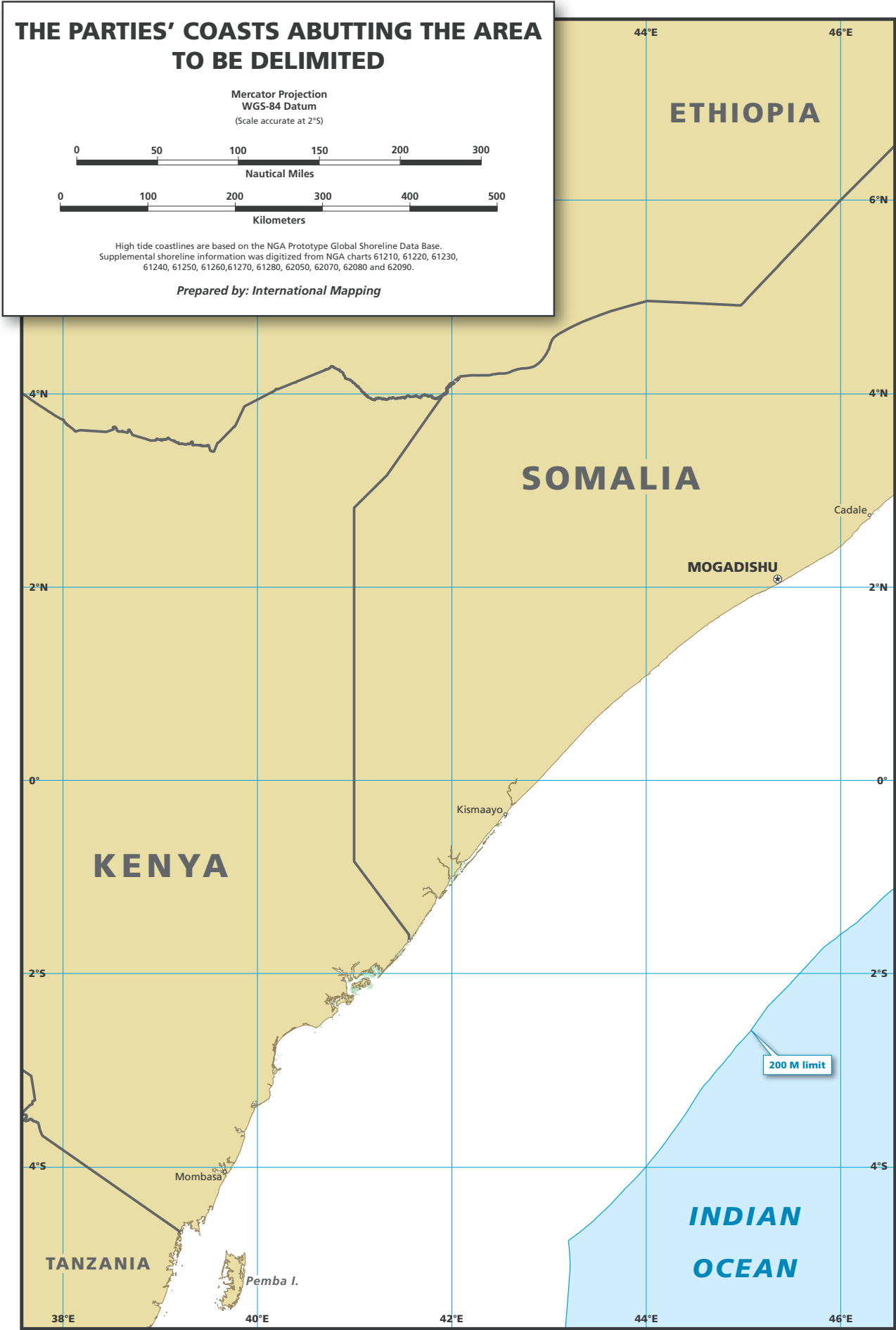




Figure 2.1

SOMALIA'S RAS KAAMBOONI AND DIUA DAMASCIACA ISLANDS

(DigitalGlobe image from 25 December 2013 viewed in Google Earth)



Figure 2.2

THE SOMALI BASIN

(Sea Floor modeling generated from ETOPO data)

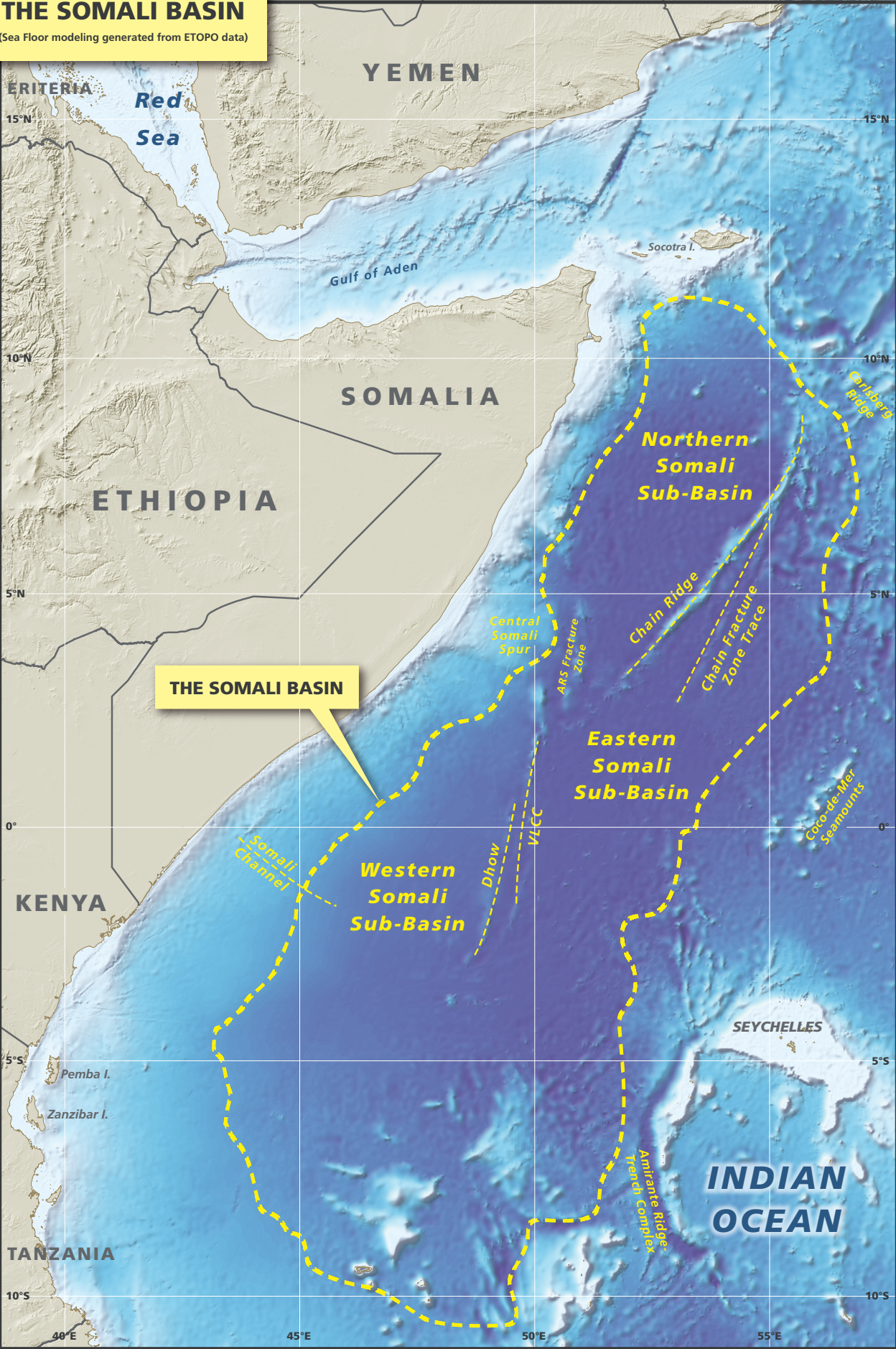


Figure 2.3

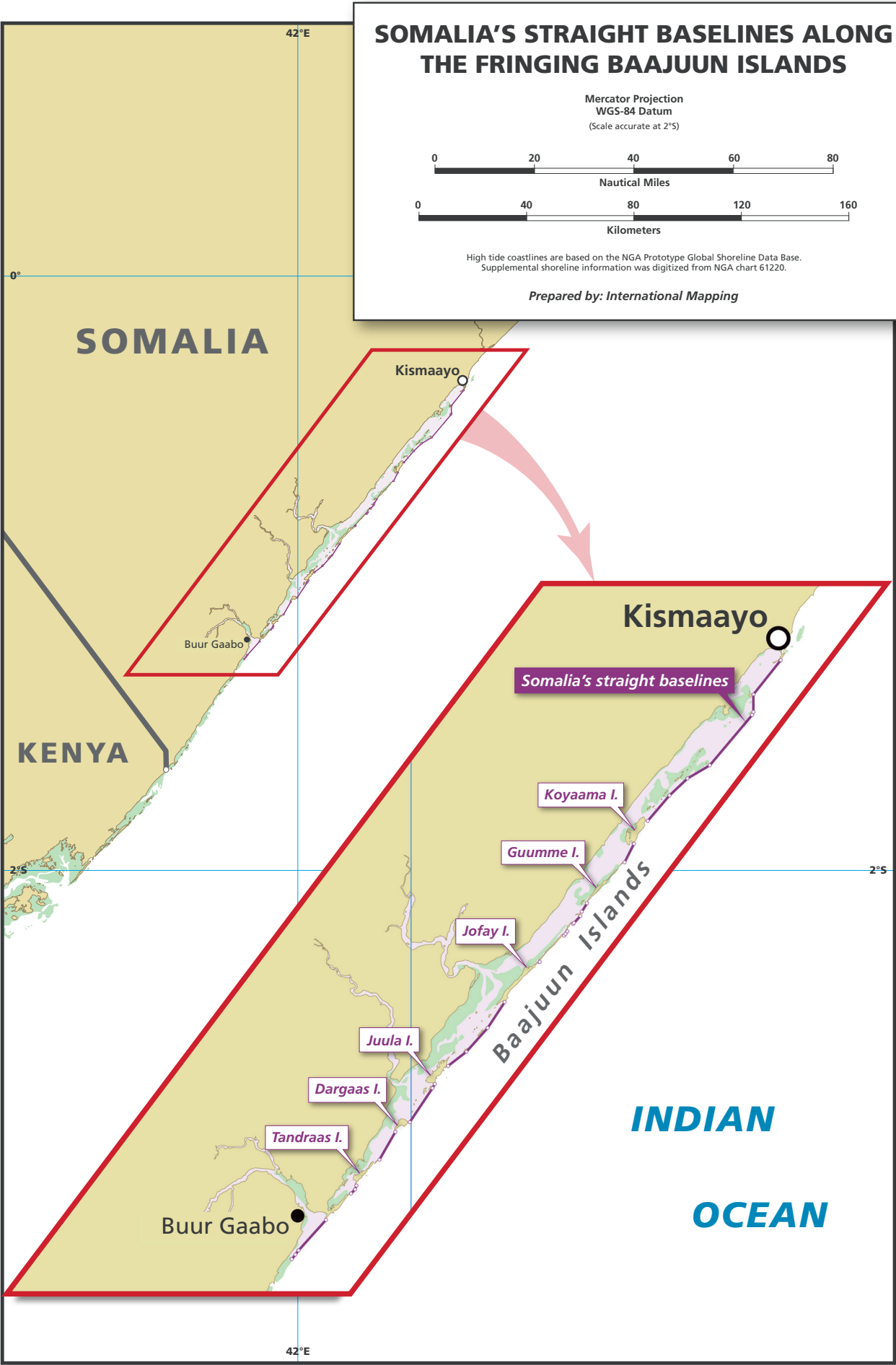
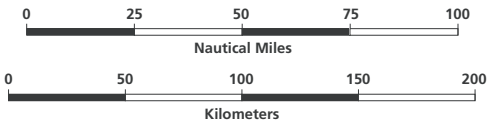


Figure 3.1

**KENYA'S STRAIGHT BASELINES,
AS AMENDED (2005)**

Mercator Projection
WGS-84 Datum
(Scale accurate at 2°S)



High tide coastlines are based on the NGA Prototype Global Shoreline Data Base.
Supplemental shoreline information was digitized from NGA charts 61210, 61220, 61230,
61240, 61250, 61260, 61270, 61280, 62050, 62070, 62080 and 62090.

Prepared by: International Mapping

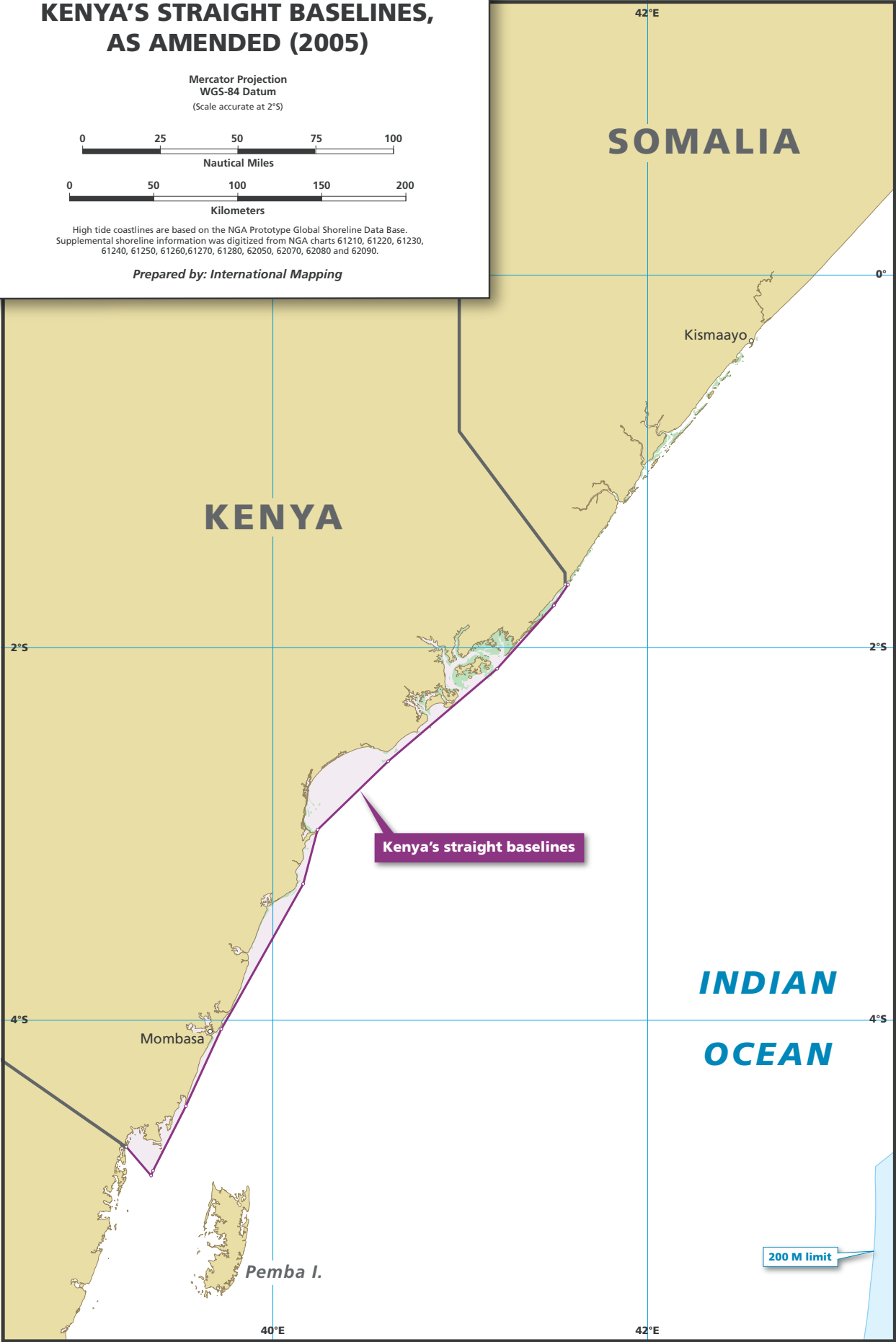


Figure 3.2

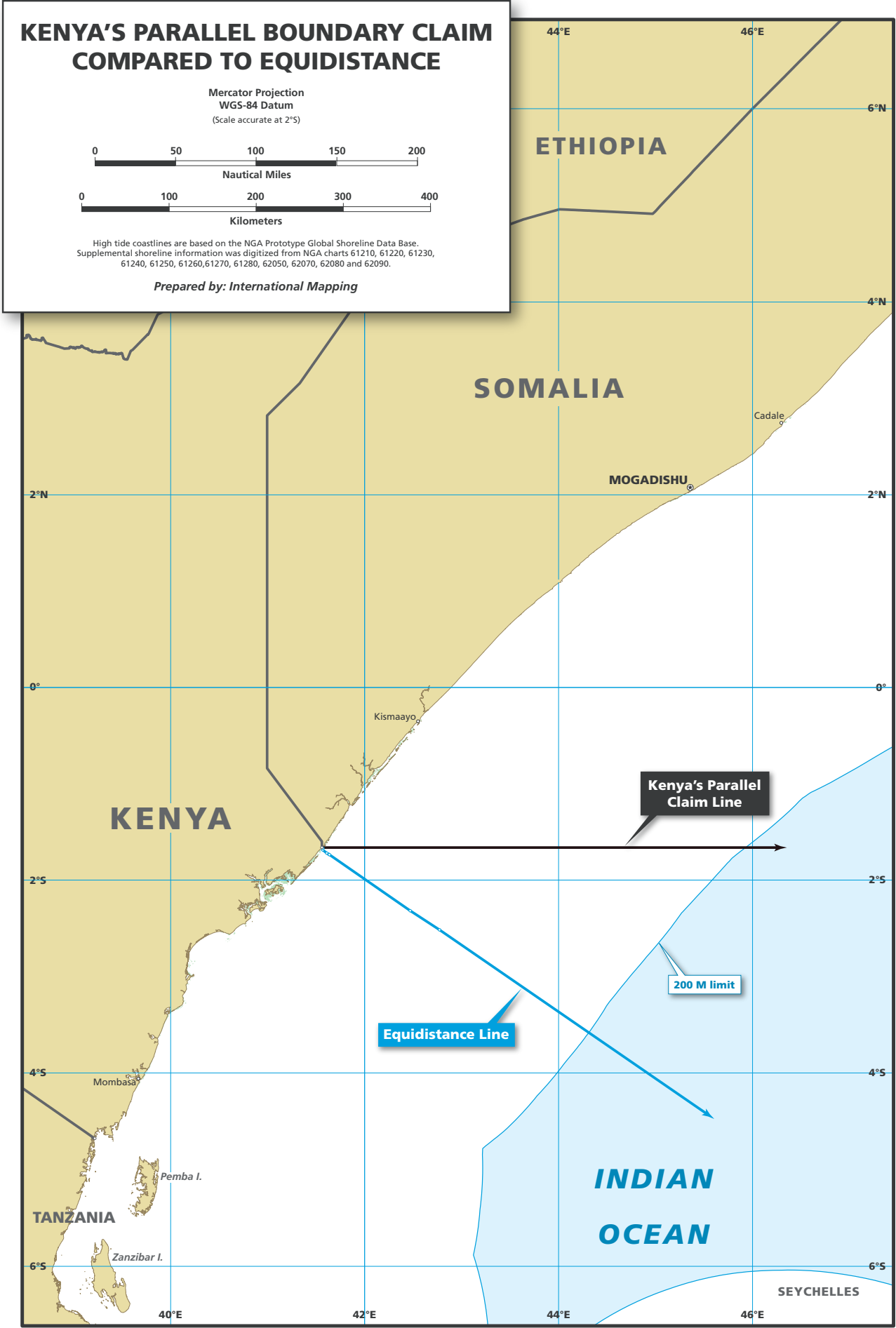


Figure 3.3

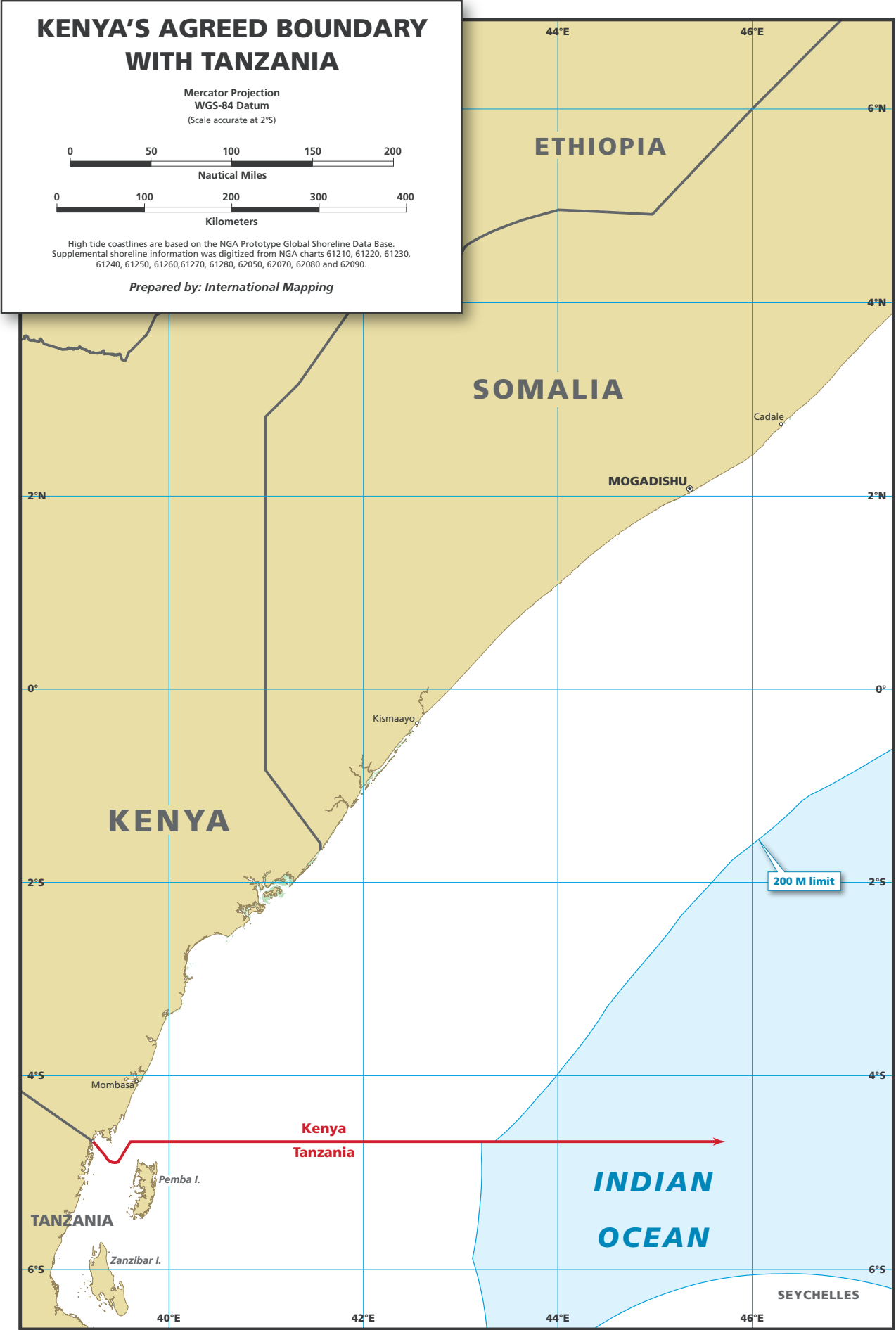
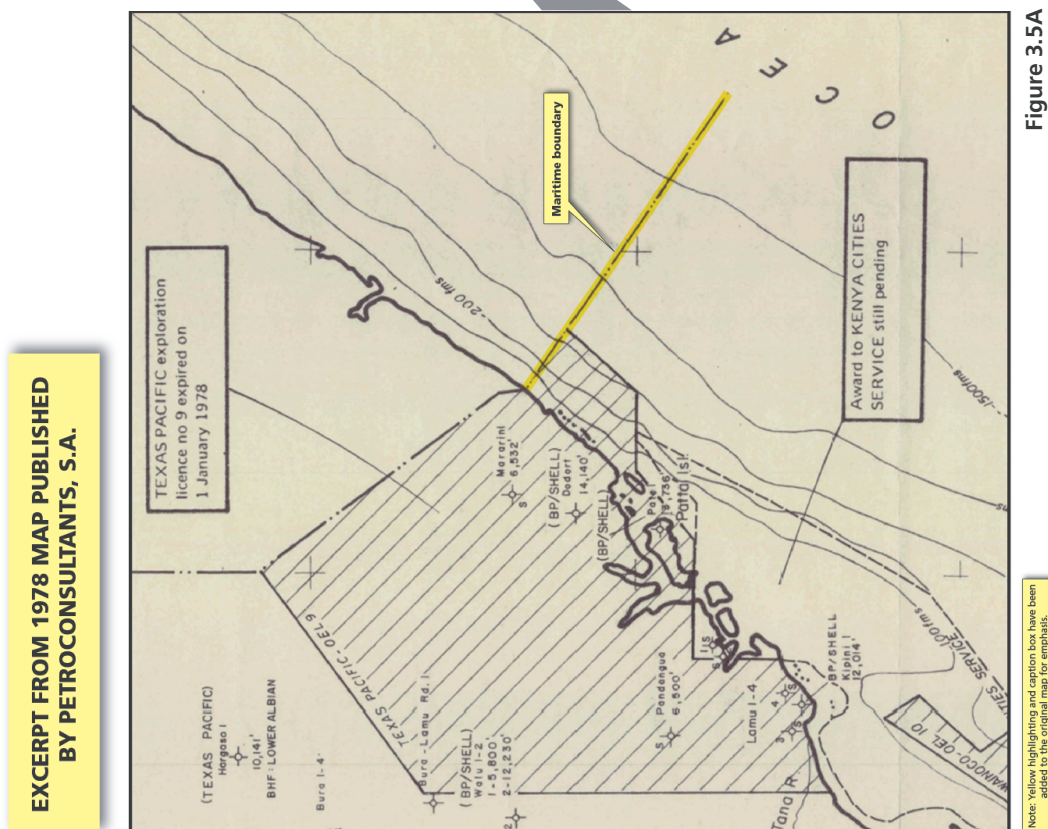
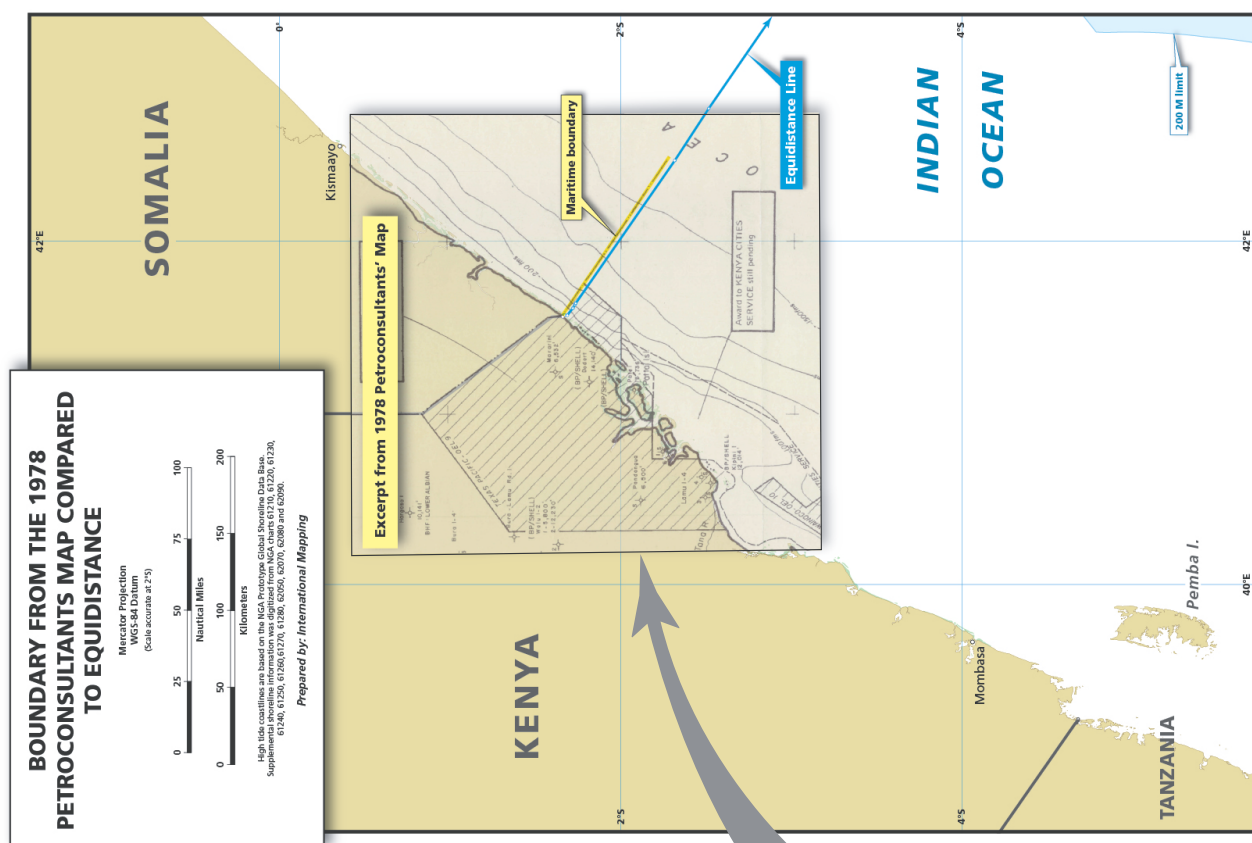
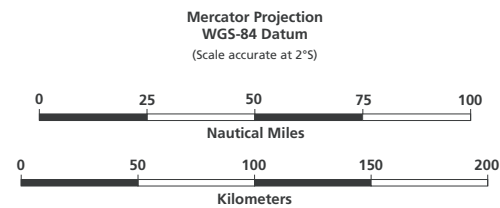


Figure 3.4



Figures 3.5A & 3.5B

**LIMIT OF THE JORRE OFFSHORE BLOCK
AS DEPICTED ON THE 2002 IHS SOMALIA MAP
COMPARED TO EQUIDISTANCE**



High tide coastlines are based on the NGA Prototype Global Shoreline Data Base.
Supplemental shoreline information was digitized from NGA charts 61210, 61220, 61230,
61240, 61250, 61260, 61270, 61280, 62050, 62070, 62080 and 62090.

Prepared by: International Mapping

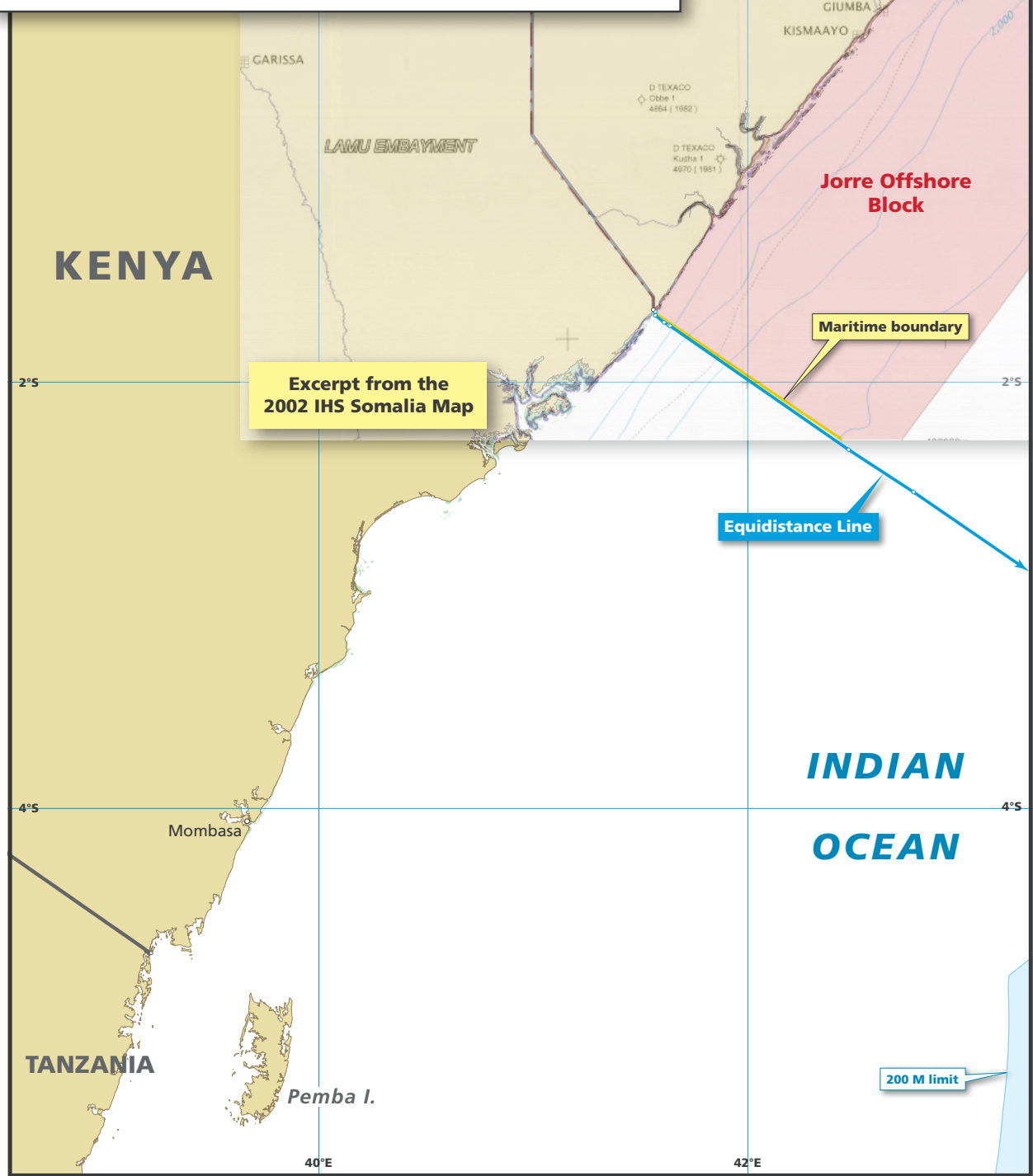
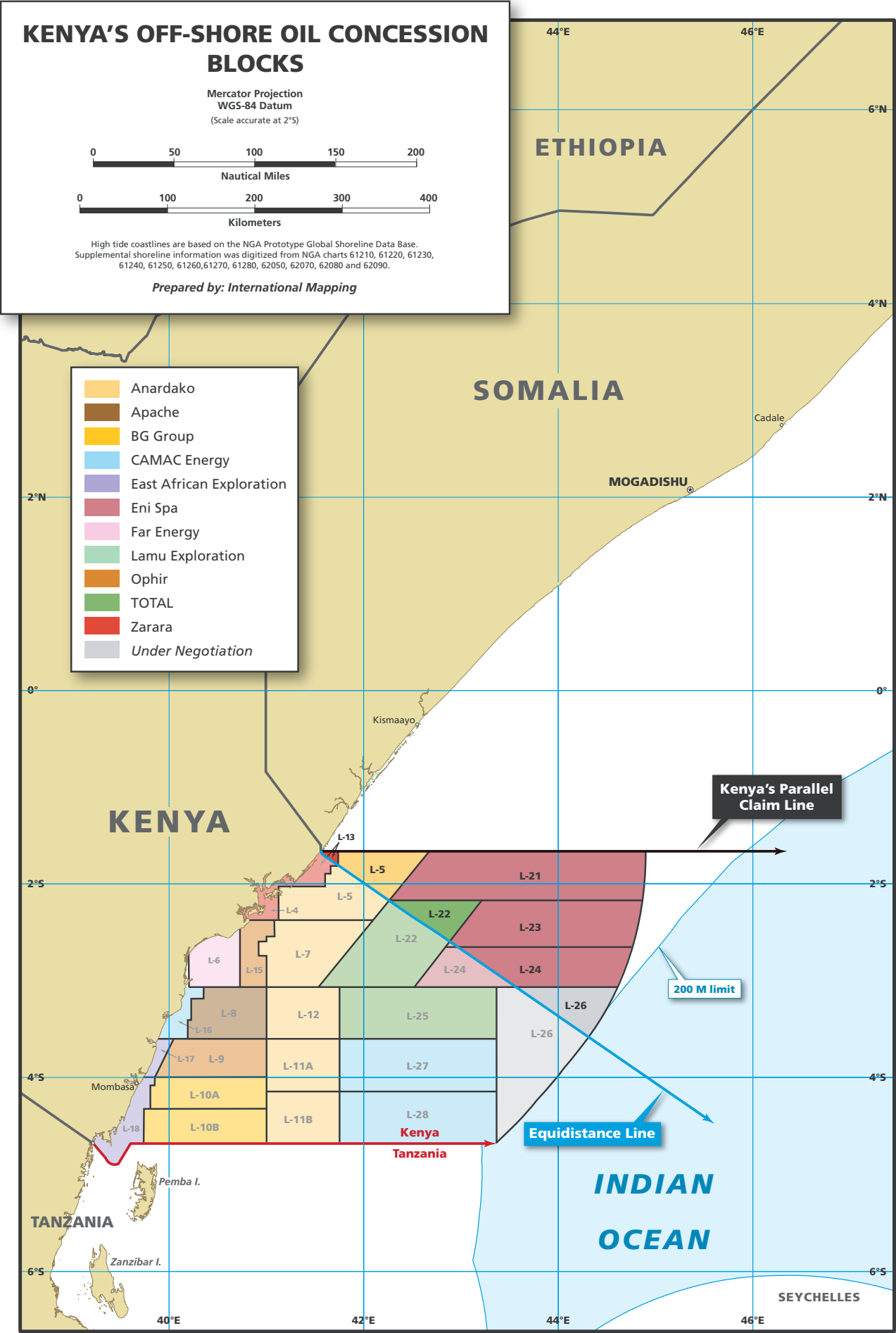


Figure 3.6



JUBALAND BOUNDARY SETTLEMENT TREATY OF LONDON JULY 1924

MAP ATTACHED TO THE
1924 TREATY

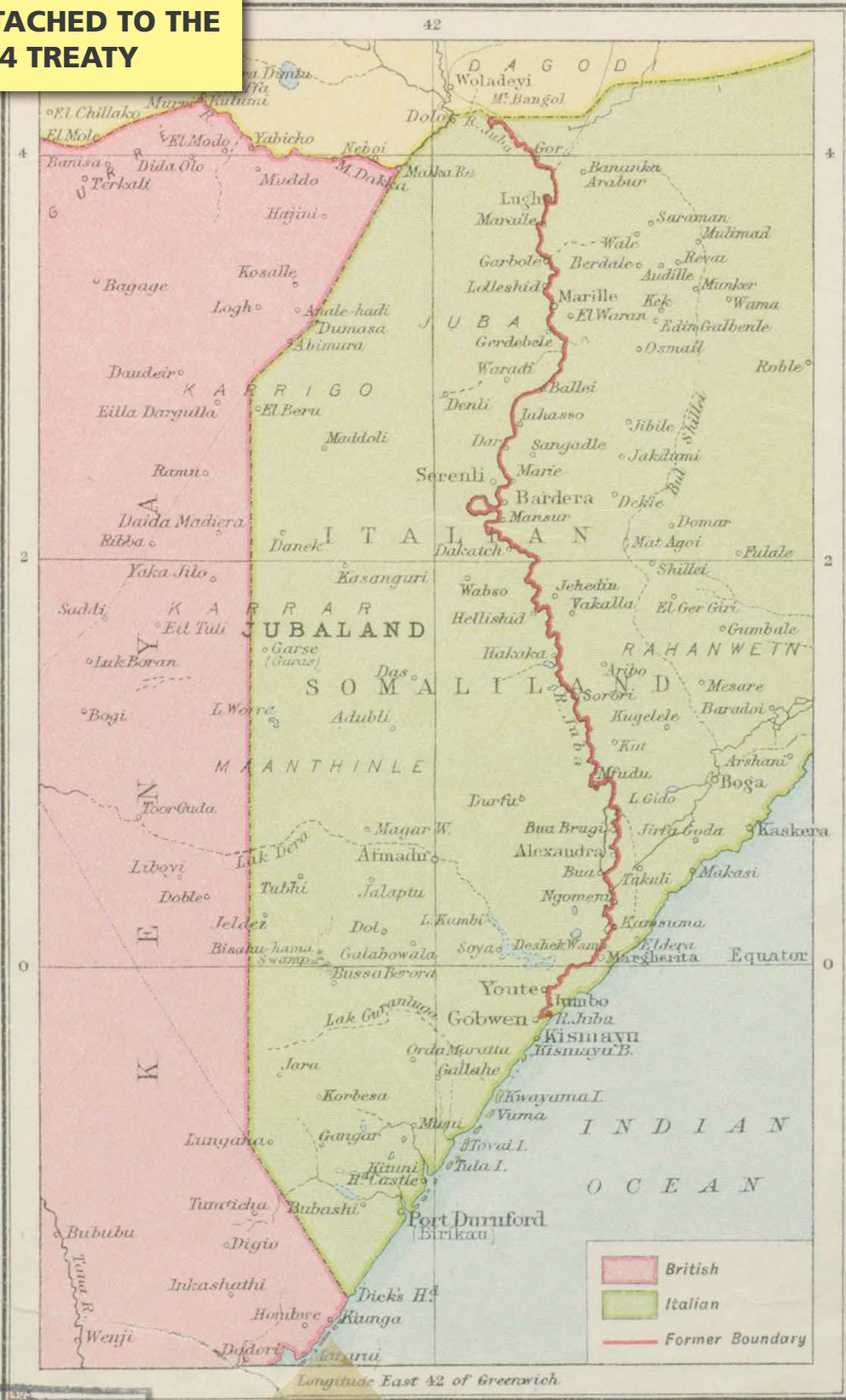


Figure 4.1

MAP PREPARED BY THE ANGLO-ITALIAN
BOUNDARY COMMISSION

(1925-1927)

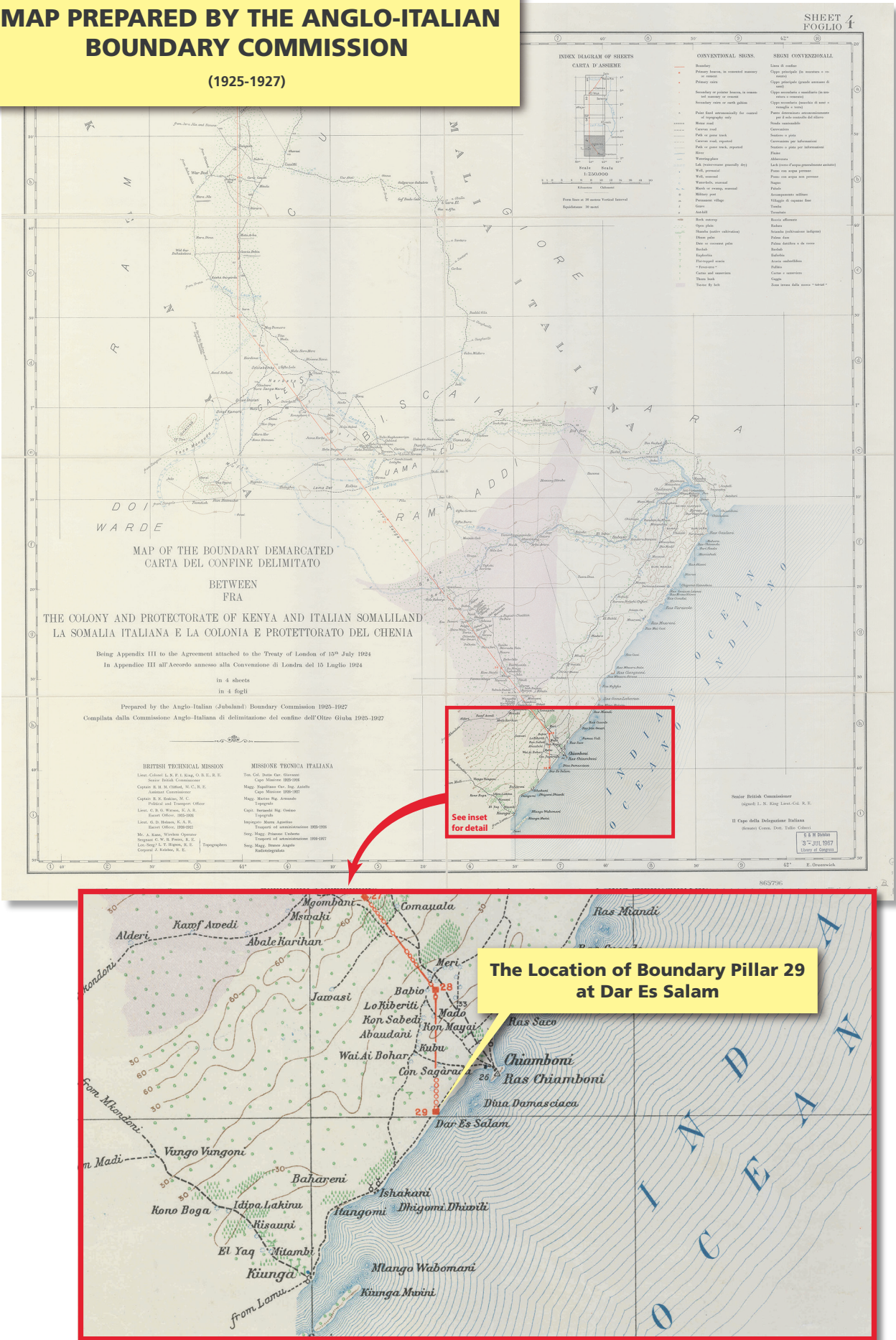


Figure 4.2

**EXPECTED LOCATION OF PRIMARY
BEACON No. 29**

(DigitalGlobe image from 9 February 2010 viewed in Google Earth)

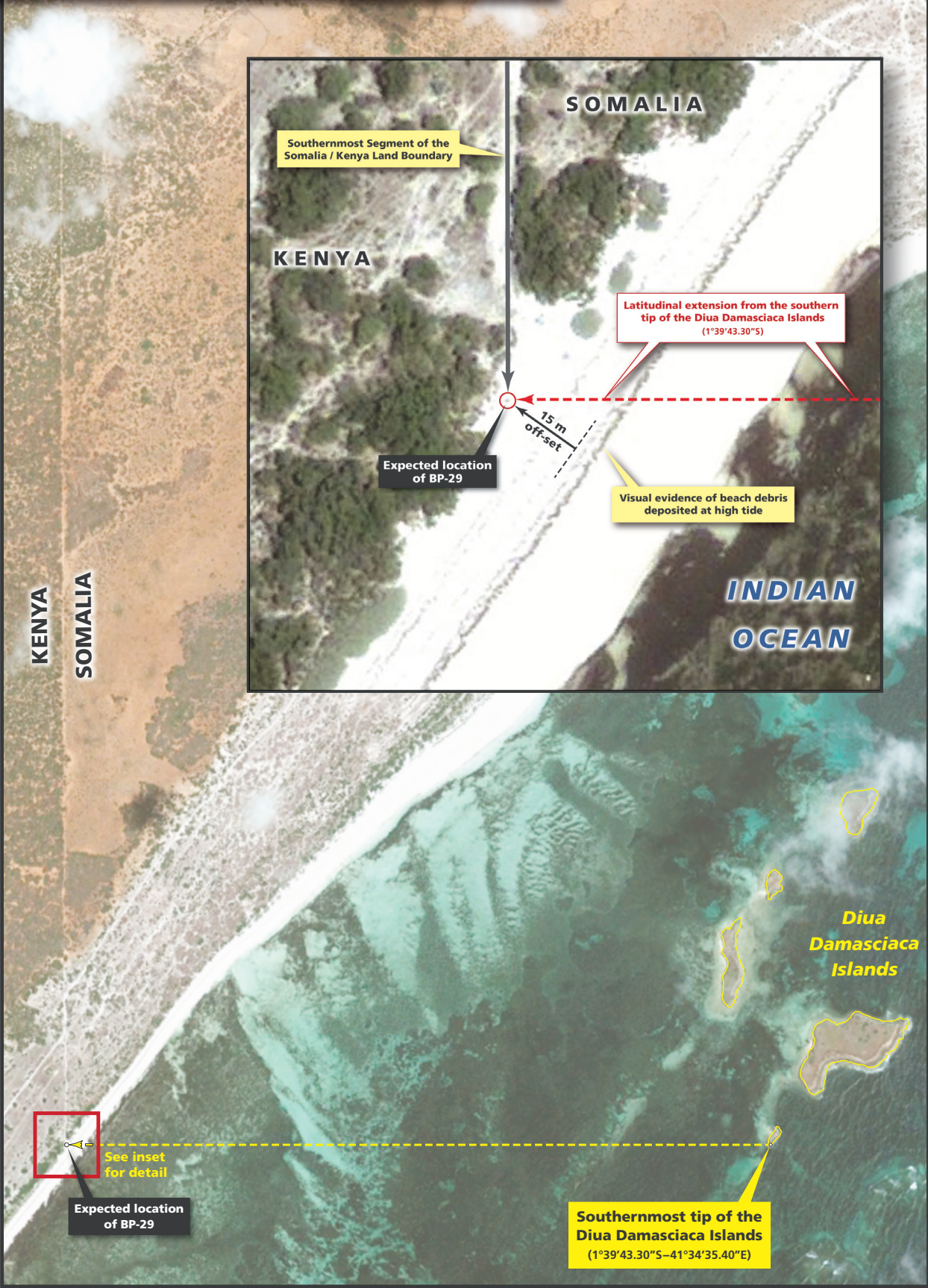


Figure 4.3

**THE LAND BOUNDARY TERMINUS ON THE
PARTIES' LOW-TIDE COAST**

(DigitalGlobe image from 9 February 2010 viewed in Google Earth)



Figure 4.4

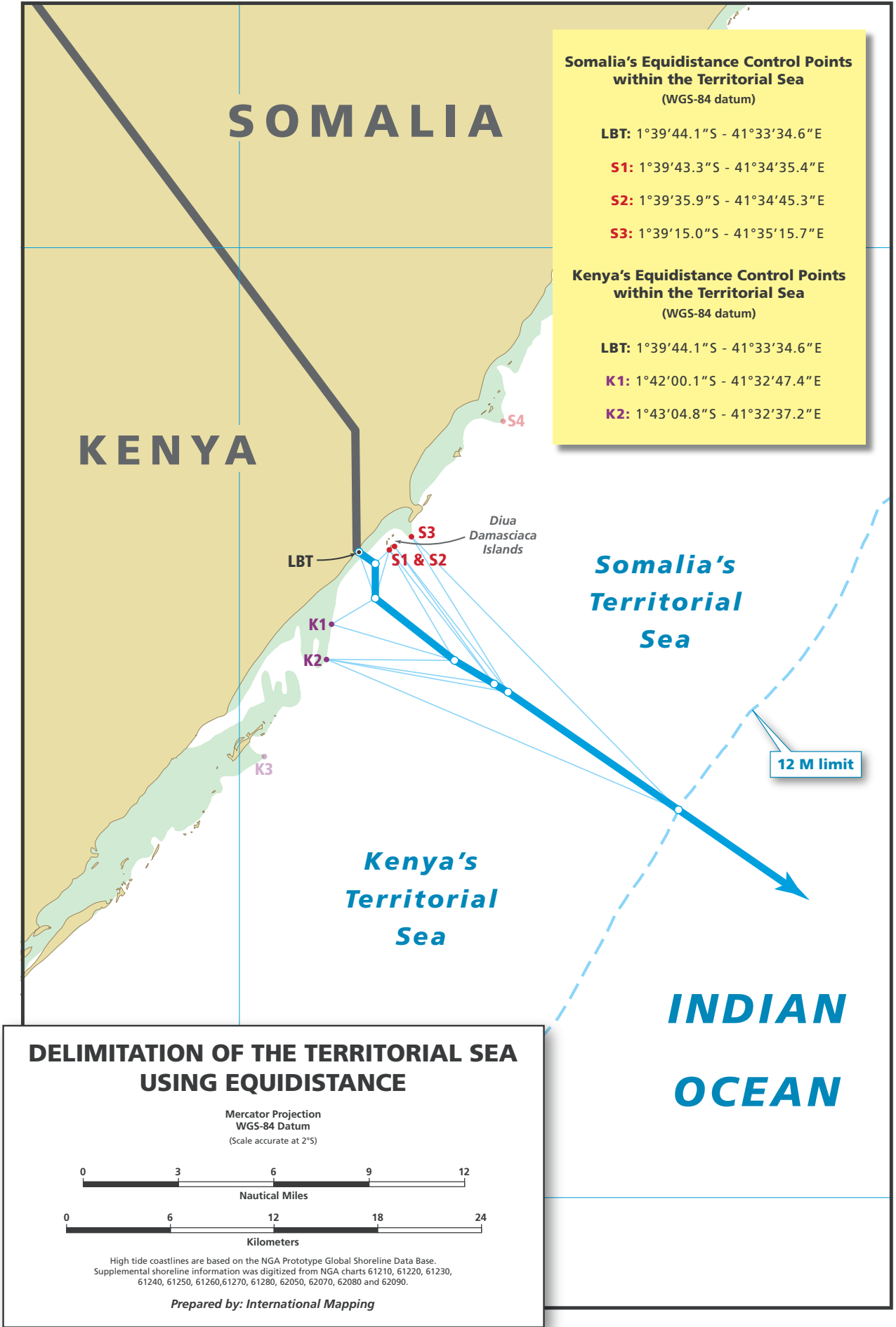


Figure 5.1

**THE PARALLEL RESULTING FROM THE
COORDINATES SPECIFIED IN KENYA'S 2005
PRESIDENTIAL PROCLAMATION**

(DigitalGlobe image taken on 9 February 2010 viewed in Google Earth)

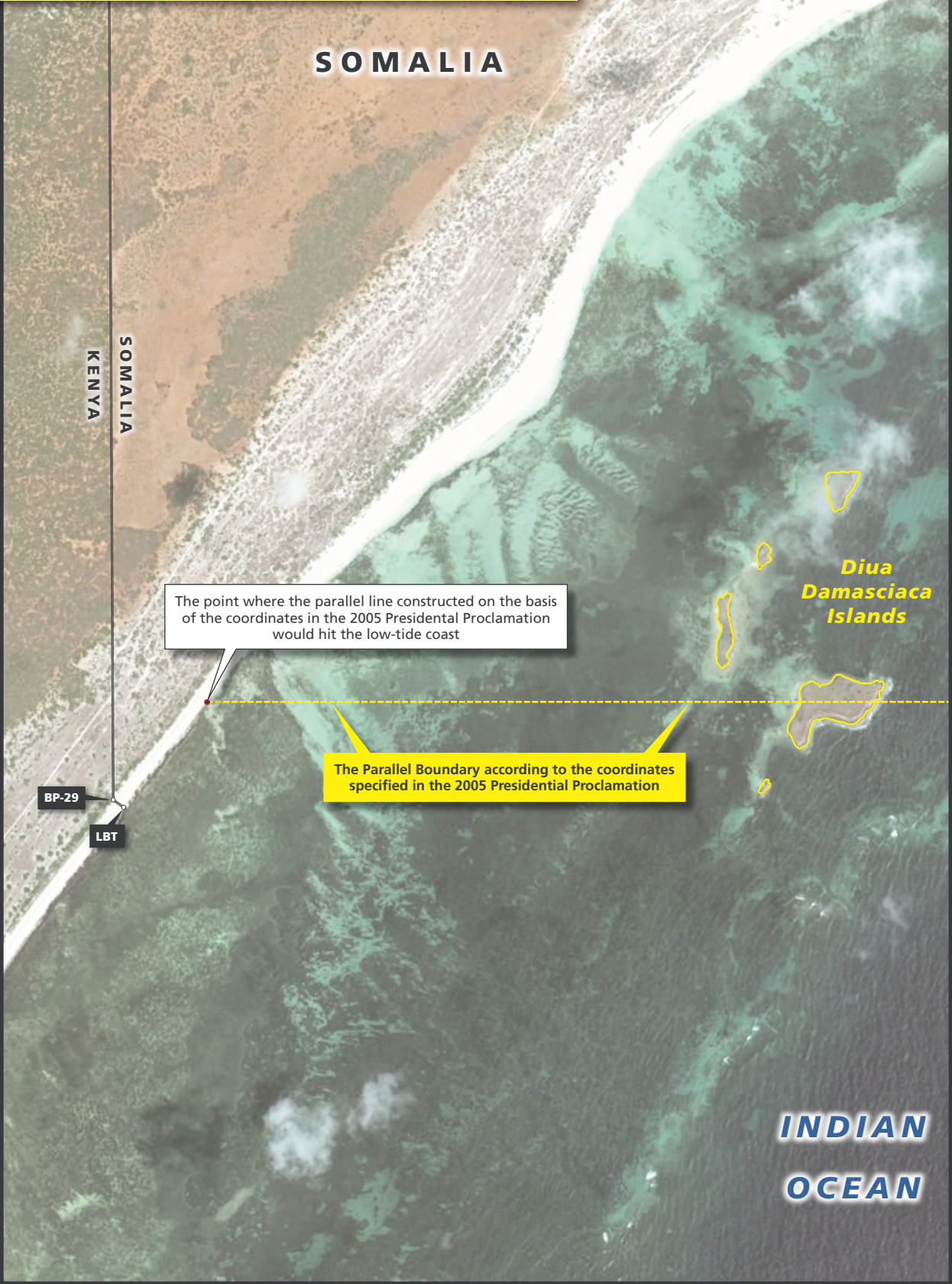


Figure 5.2

**KENYA'S PARALLEL BOUNDARY CLAIM LINE
EXTENDING EAST FROM THE LAND
BOUNDARY TERMINUS**

(DigitalGlobe image from 9 February 2010 viewed in Google Earth)

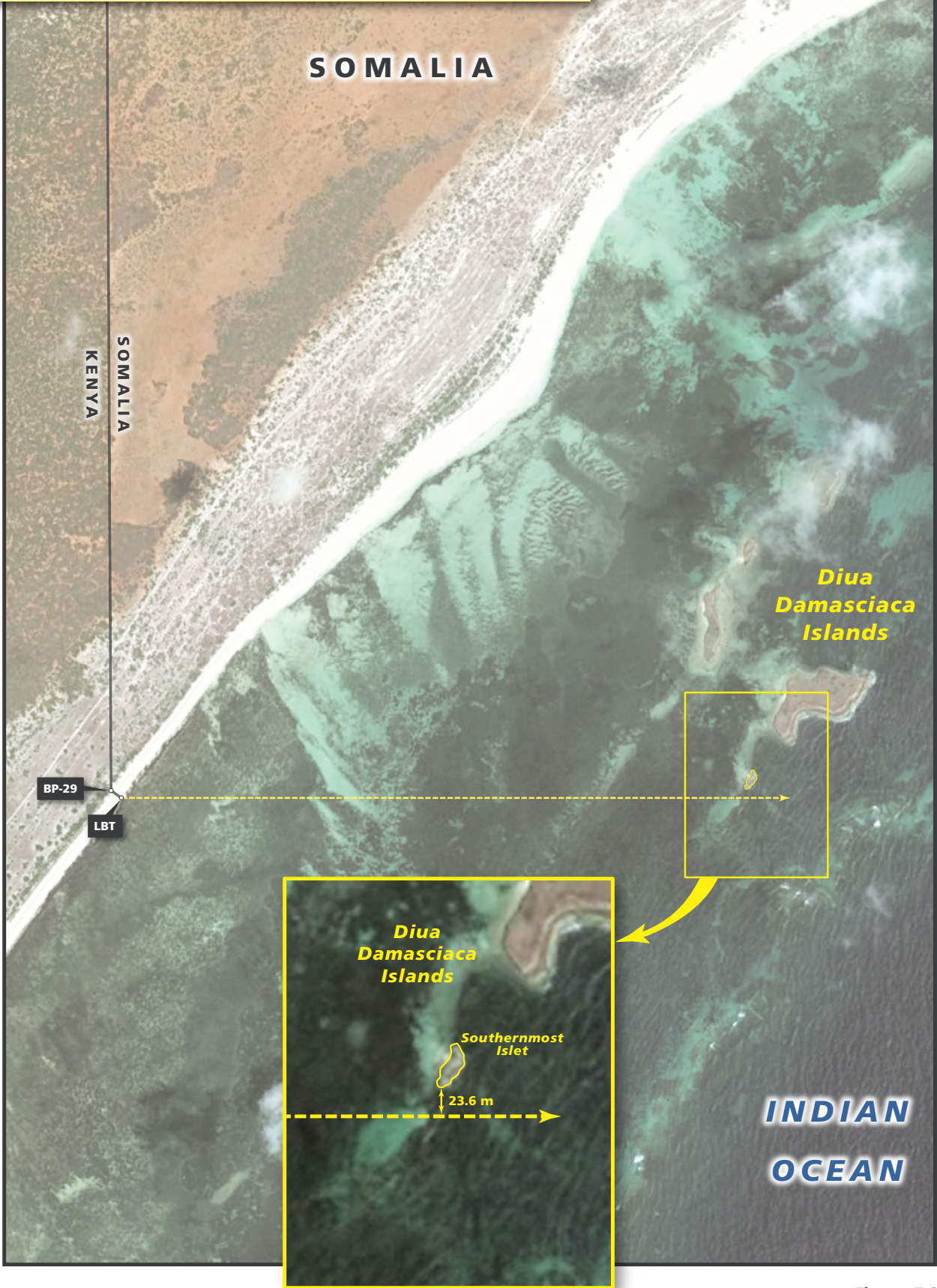


Figure 5.3

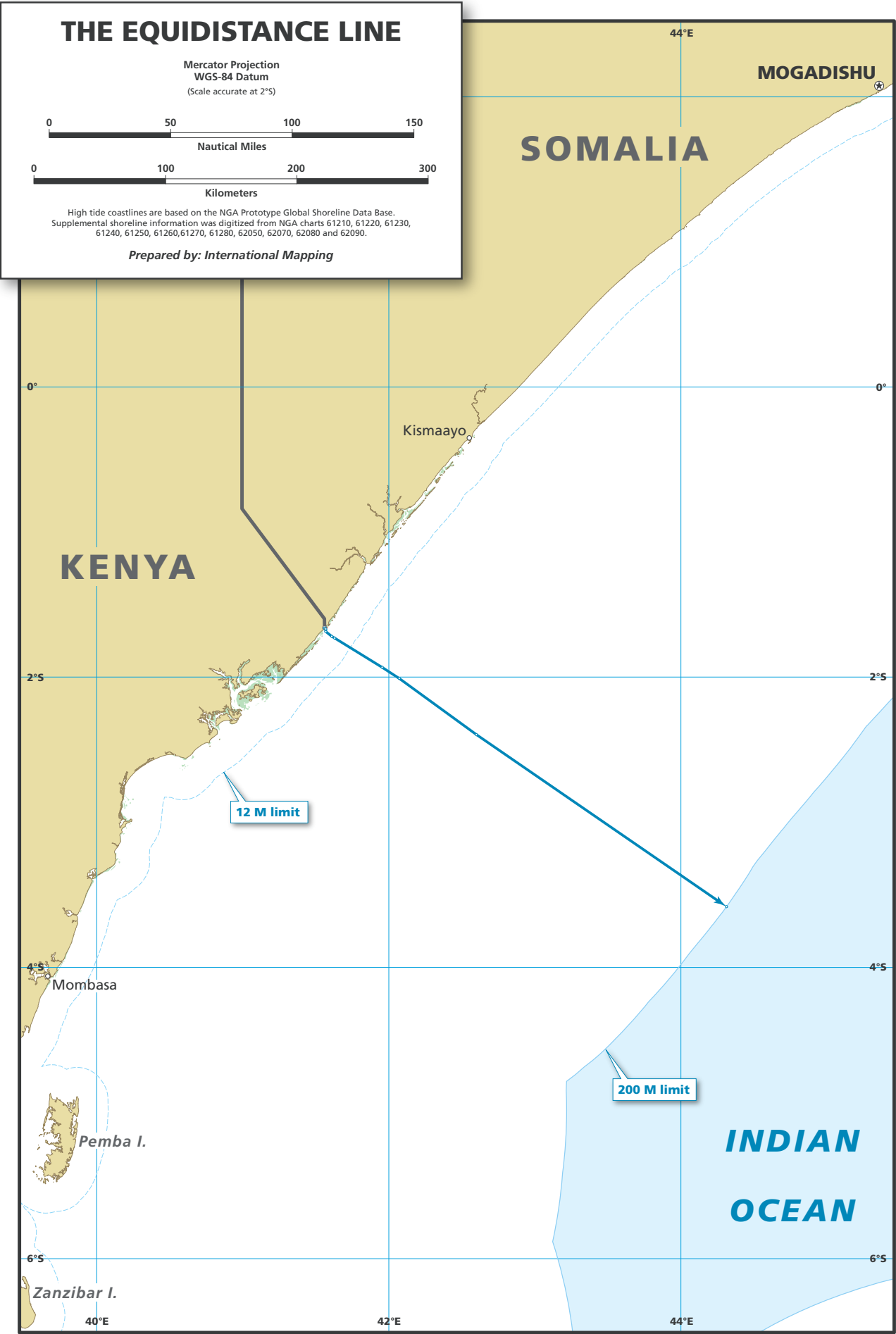


Figure 6.1

**SKETCH-MAP 4
FROM THE ICJ JUDGMENT IN
ROMANIA v. UKRAINE
(3 February 2009)**

MARITIME DELIMITATION (JUDGMENT)

94

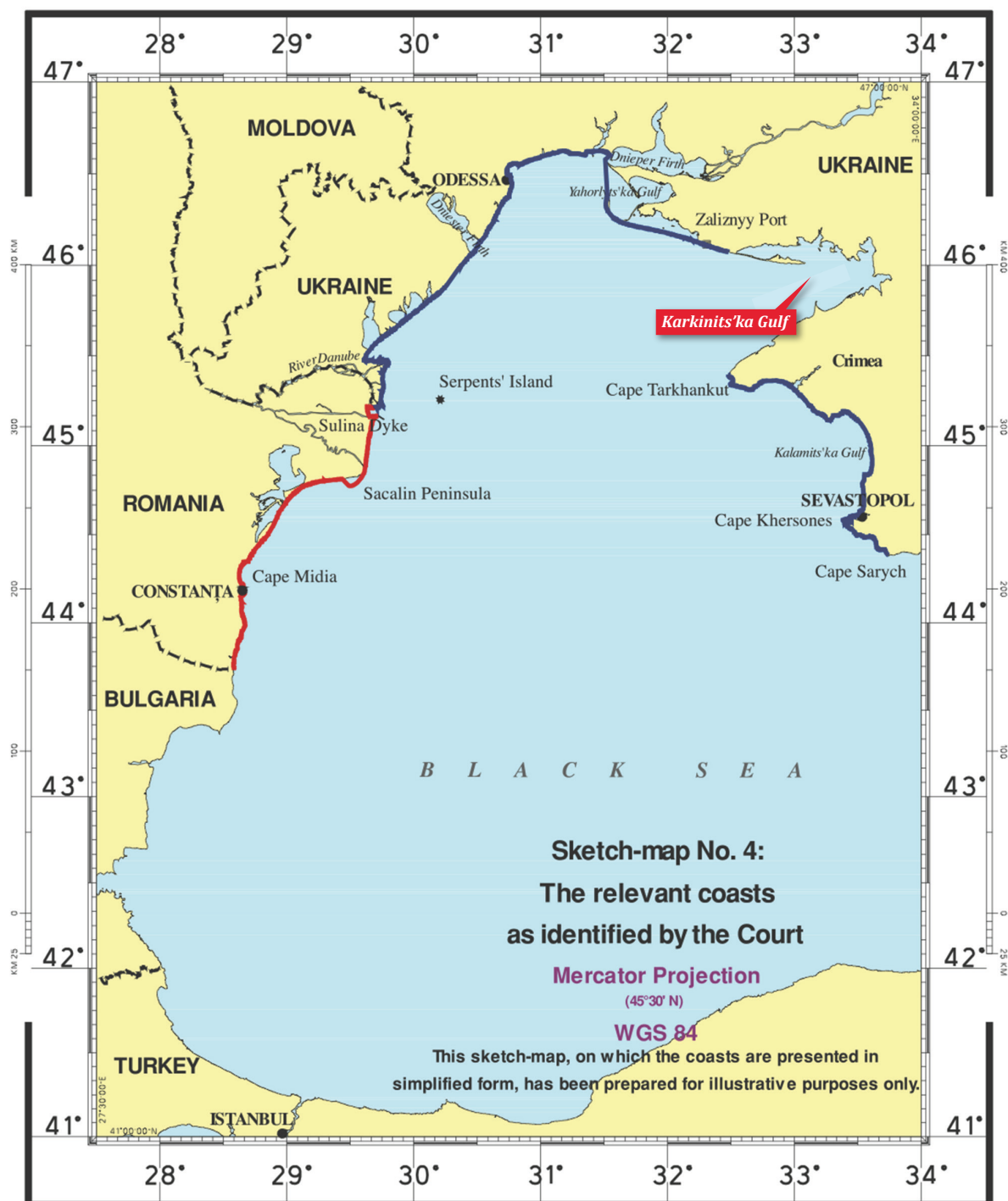


Figure 6.2

SKETCH-MAP 6
FROM THE ICJ JUDGMENT IN
NICARAGUA v. COLOMBIA
(19 November 2012)

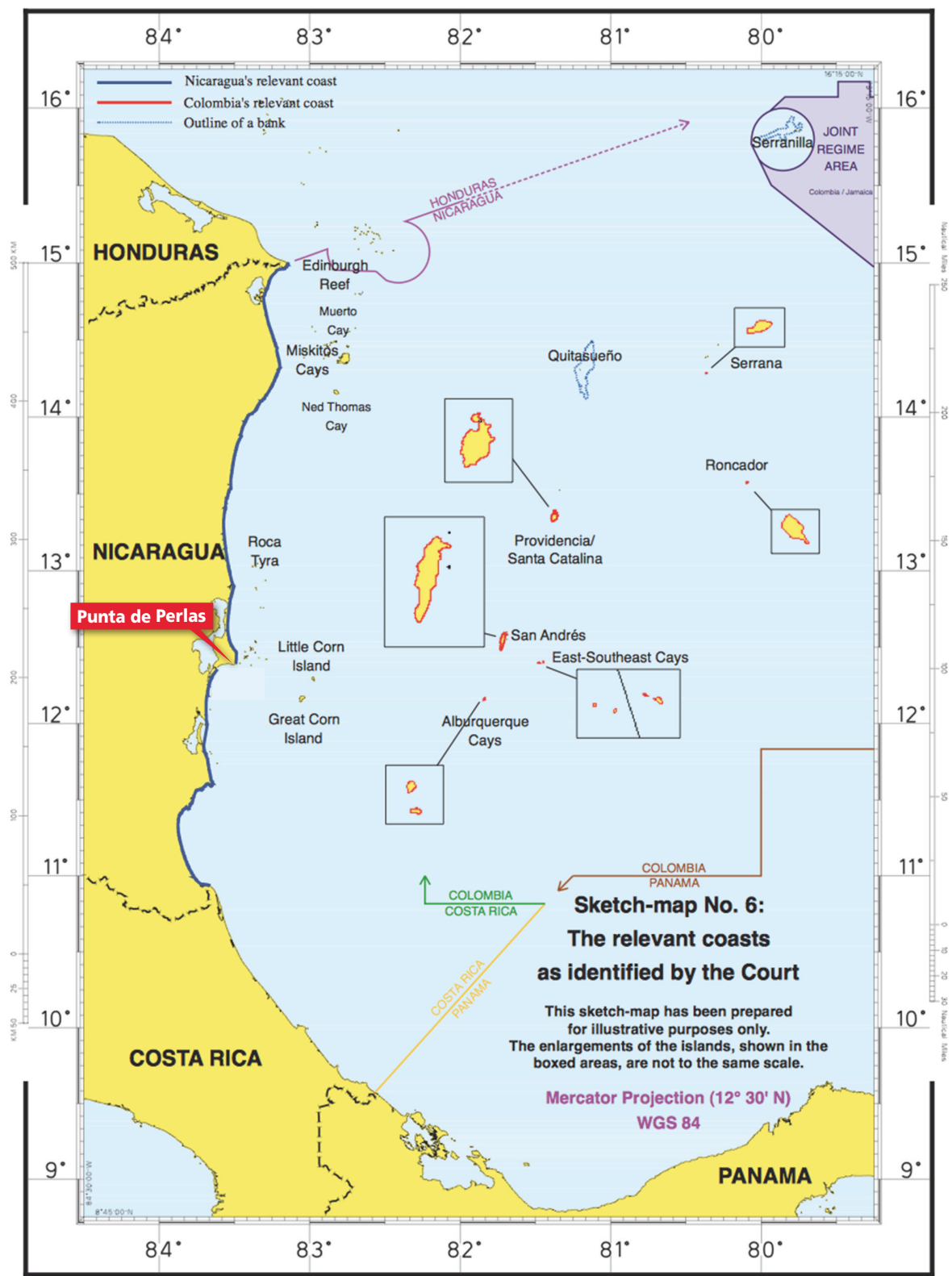


Figure 6.3

SKETCH-MAP 3 FROM THE ITLOS JUDGMENT IN BANGLADESH v. MYANMAR

(14 March 2012)

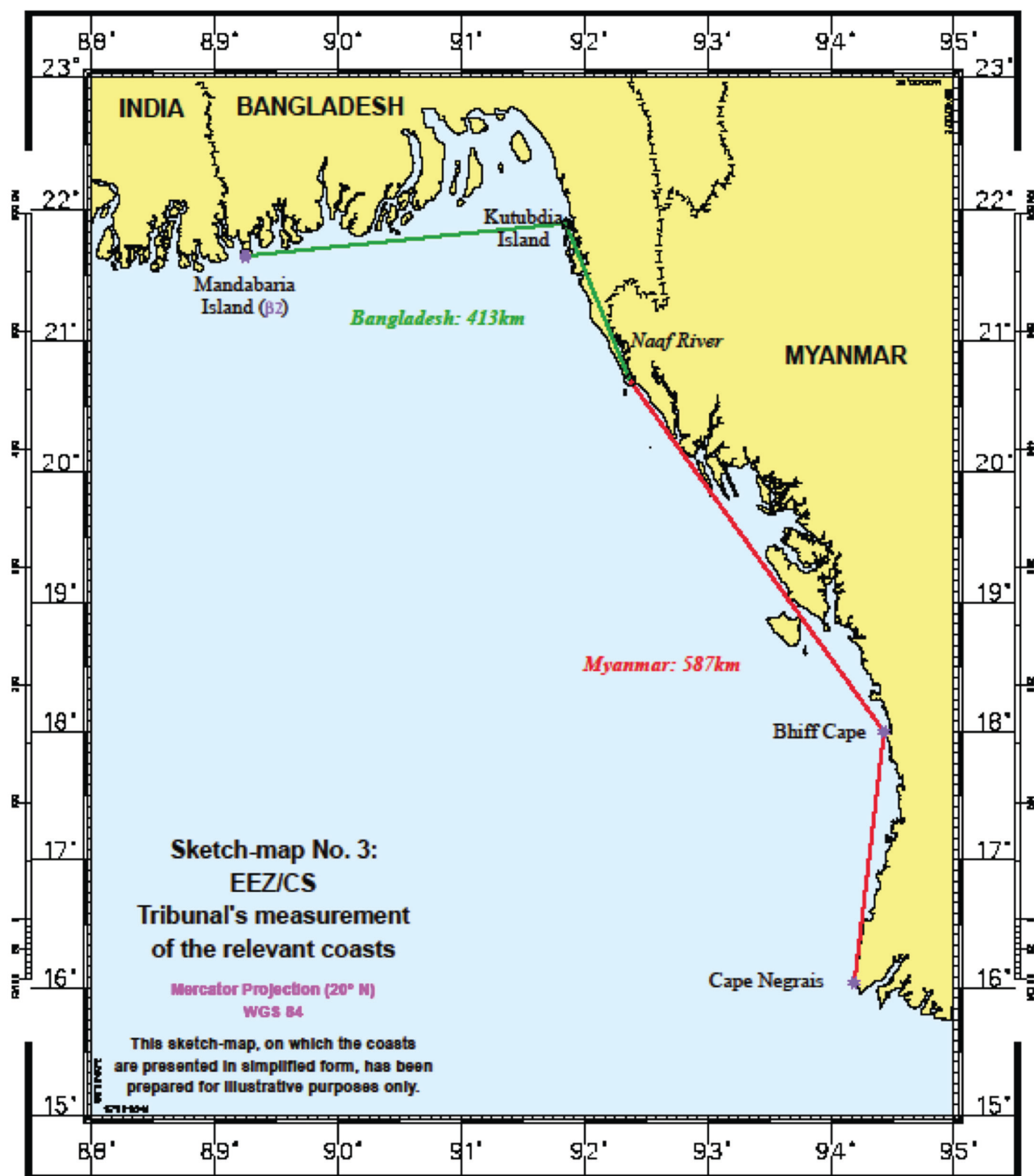
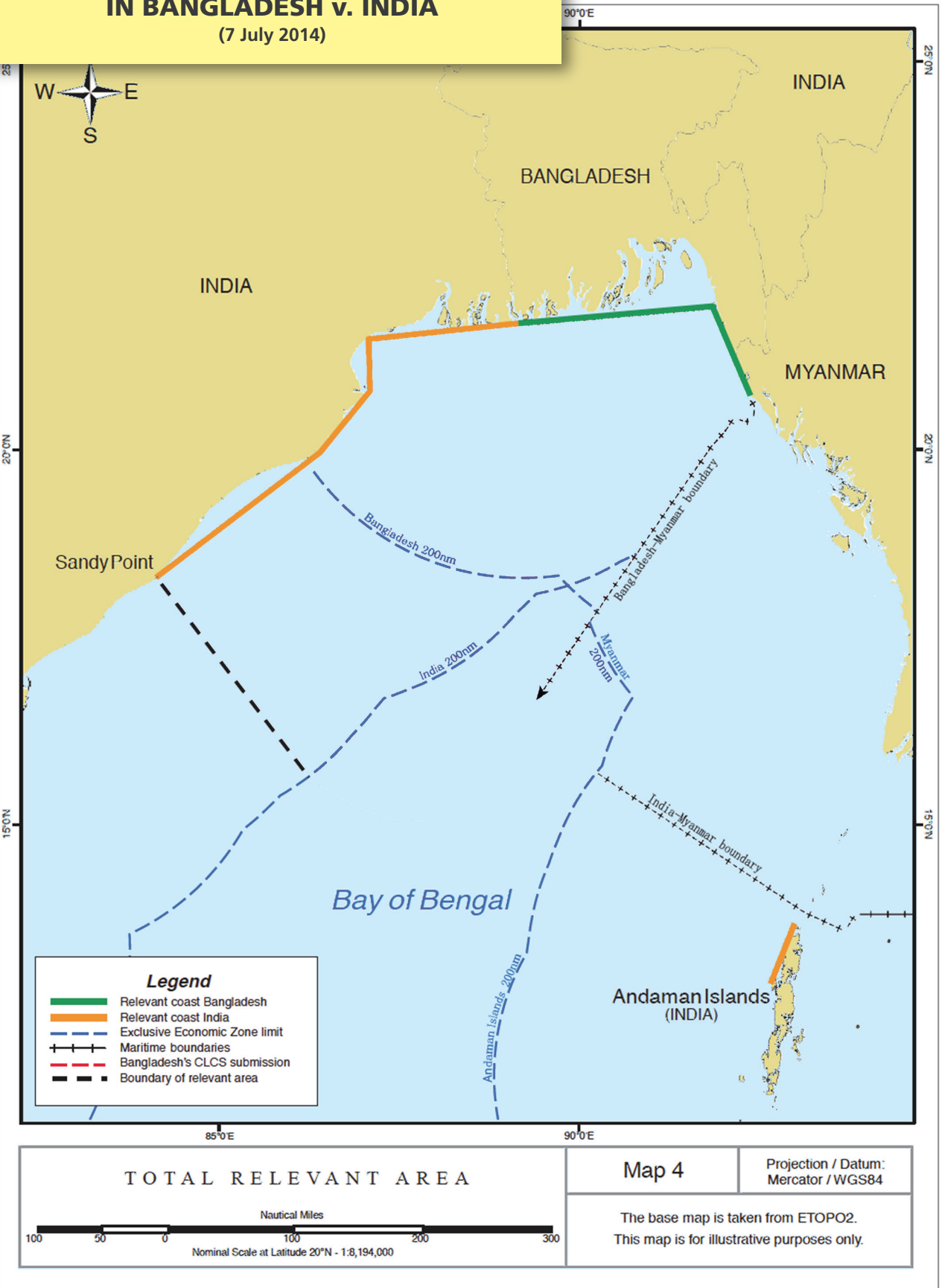


Figure 6.4

SKETCH-MAP 4
FROM THE ARBITRAL TRIBUNAL'S AWARD
IN BANGLADESH v. INDIA
(7 July 2014)



Note: the relevant area originally shown on this map has been removed to accentuate the relevant coasts. No other alterations have been made to the map.

Figure 6.5

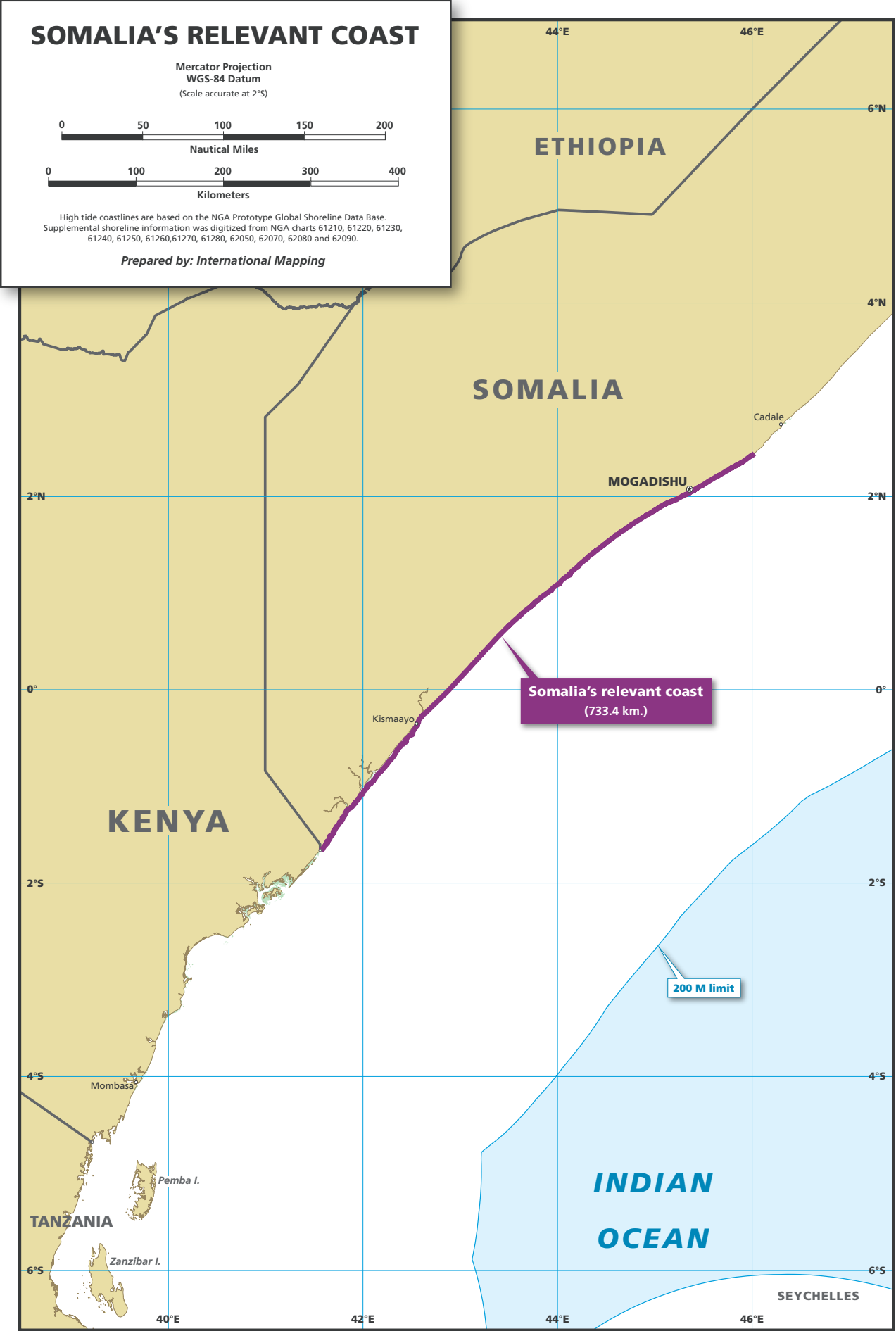


Figure 6.6

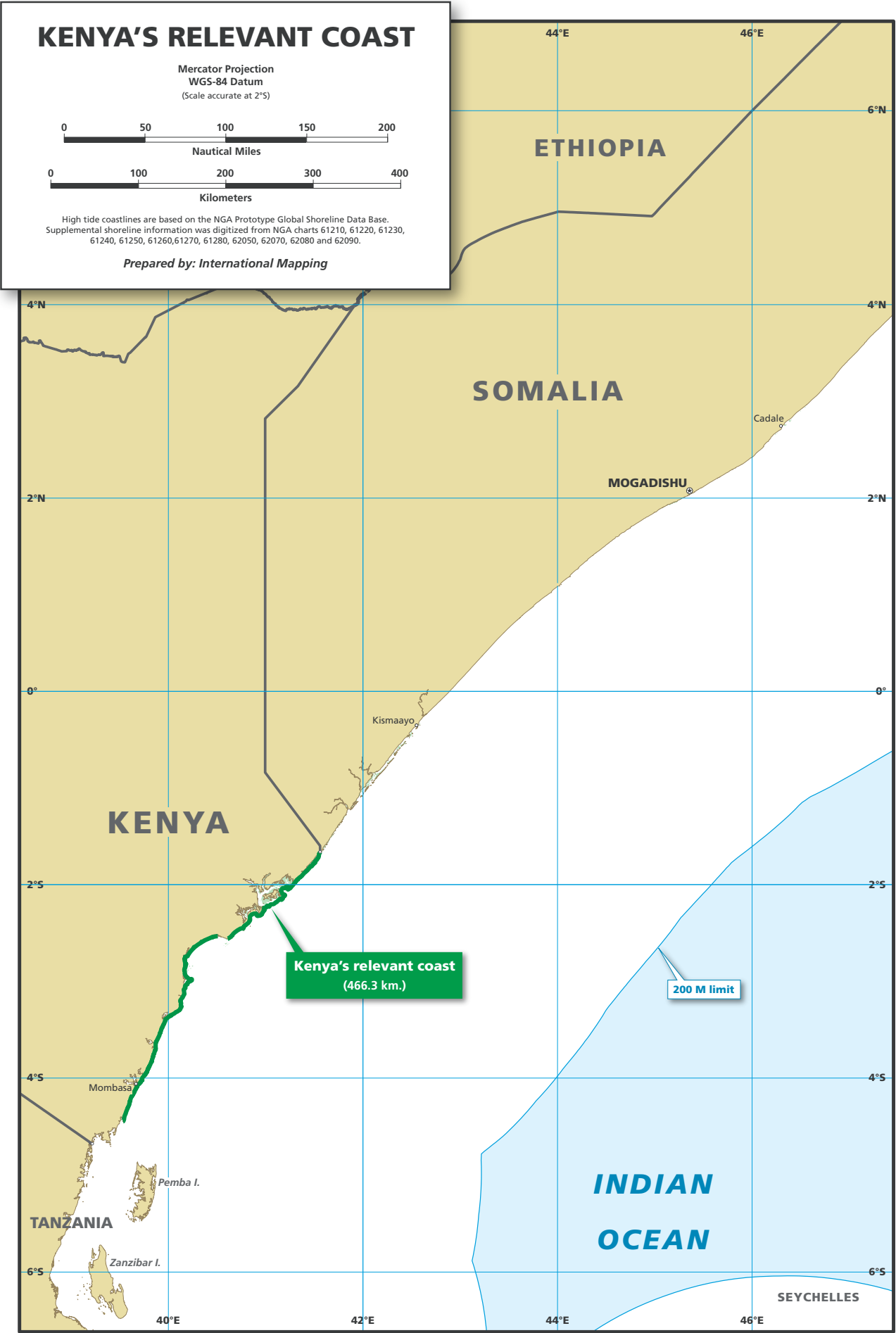


Figure 6.7

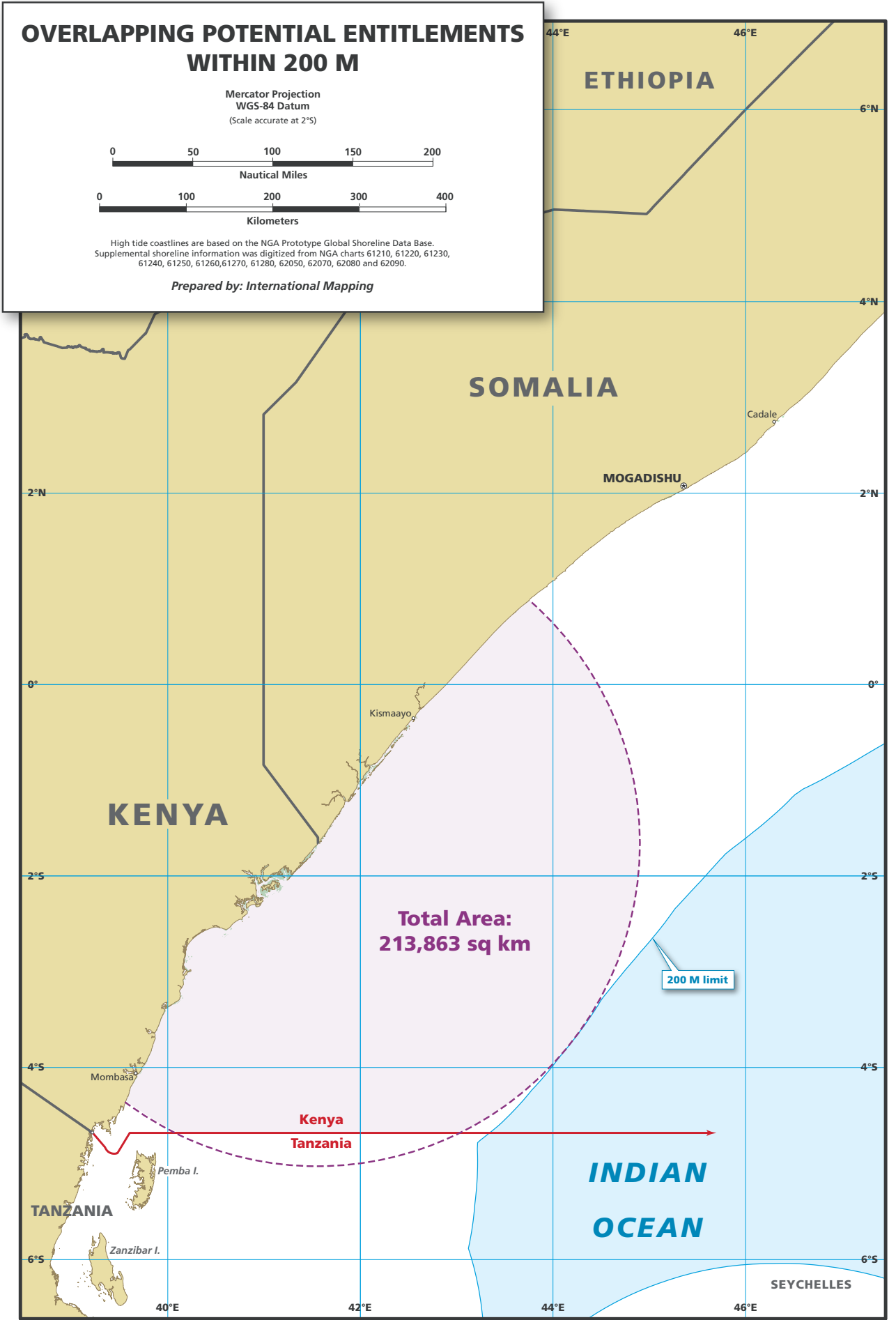
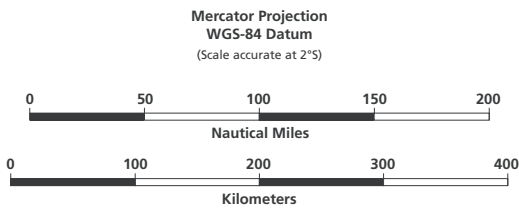


Figure 6.8

OVERLAPPING POTENTIAL ENTITLEMENTS
WITHIN AND BEYOND 200 M



High tide coastlines are based on the NGA Prototype Global Shoreline Data Base. Supplemental shoreline information was digitized from NGA charts 61210, 61220, 61230, 61240, 61250, 61260, 61270, 61280, 62050, 62070, 62080 and 62090.

Prepared by: International Mapping

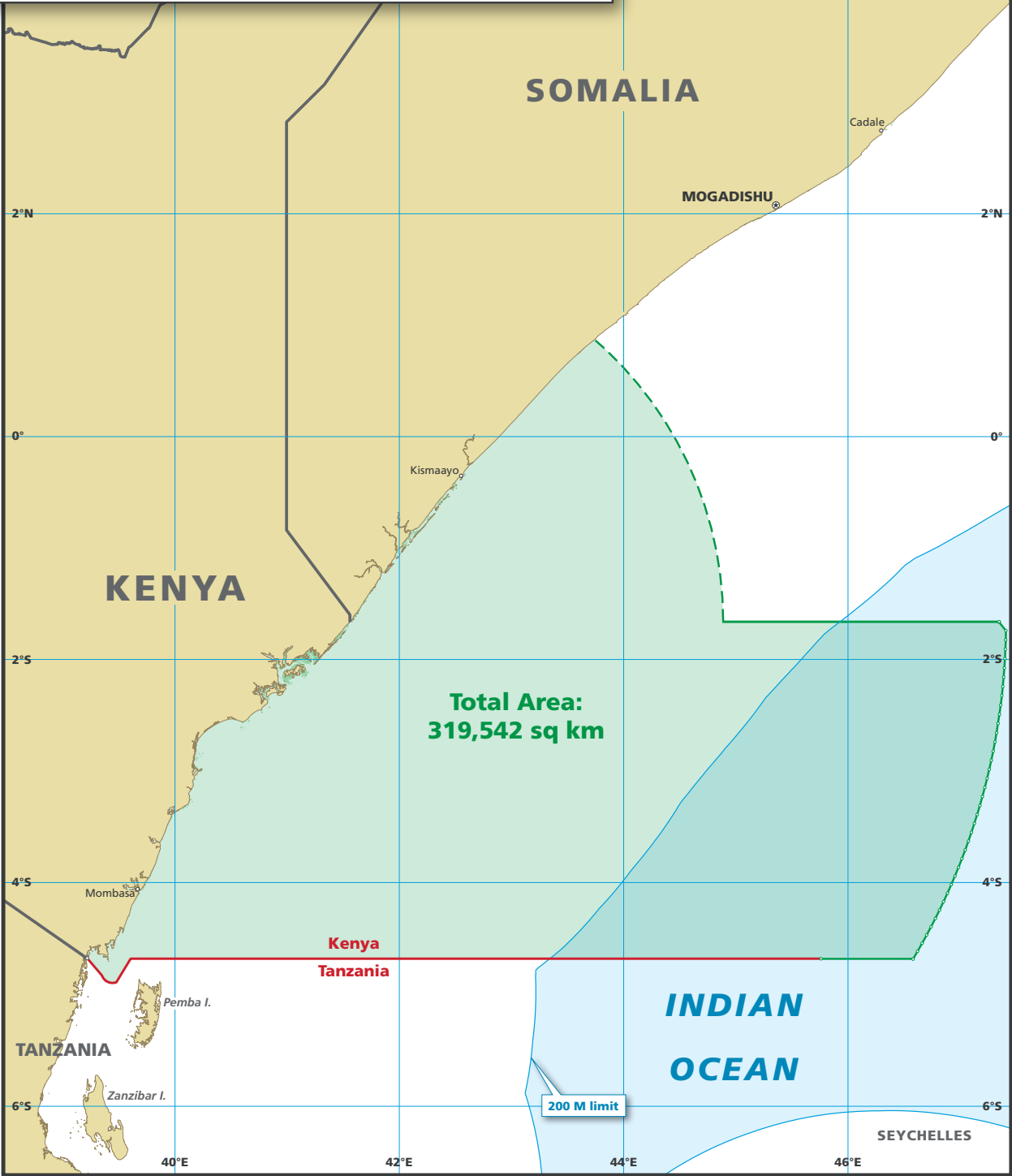


Figure 6.9

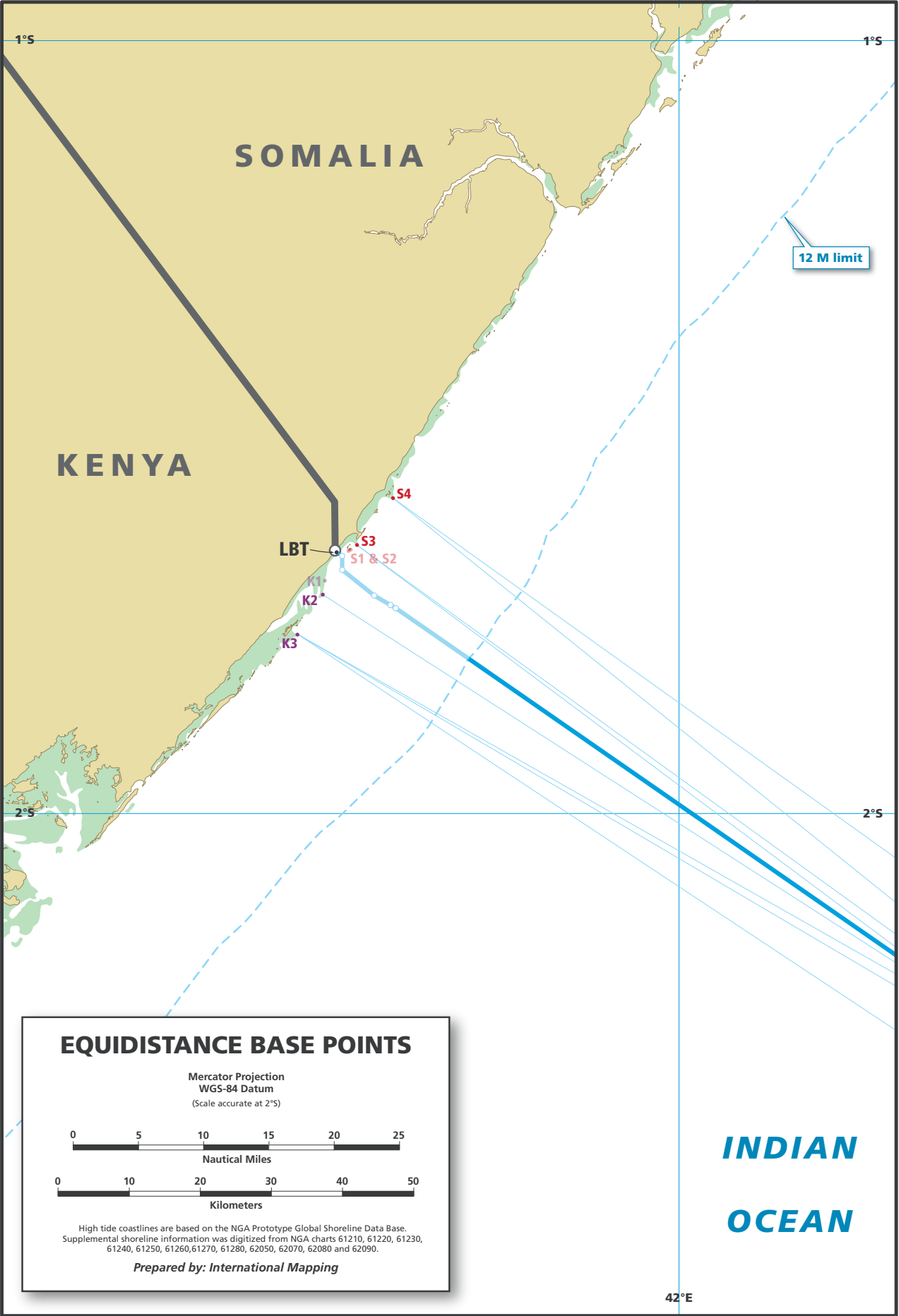
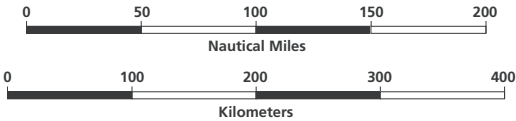


Figure 6.10

**THE EQUIDISTANCE LINE PRODUCES
ITS EFFECTS IN A REASONABLE,
MUTUALLY BALANCED FASHION**

Mercator Projection
WGS-84 Datum
(Scale accurate at 2°S)



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61240, 61250, 61260, 61270, 61280, 62050, 62070, 62080 and 62090.

Prepared by: International Mapping

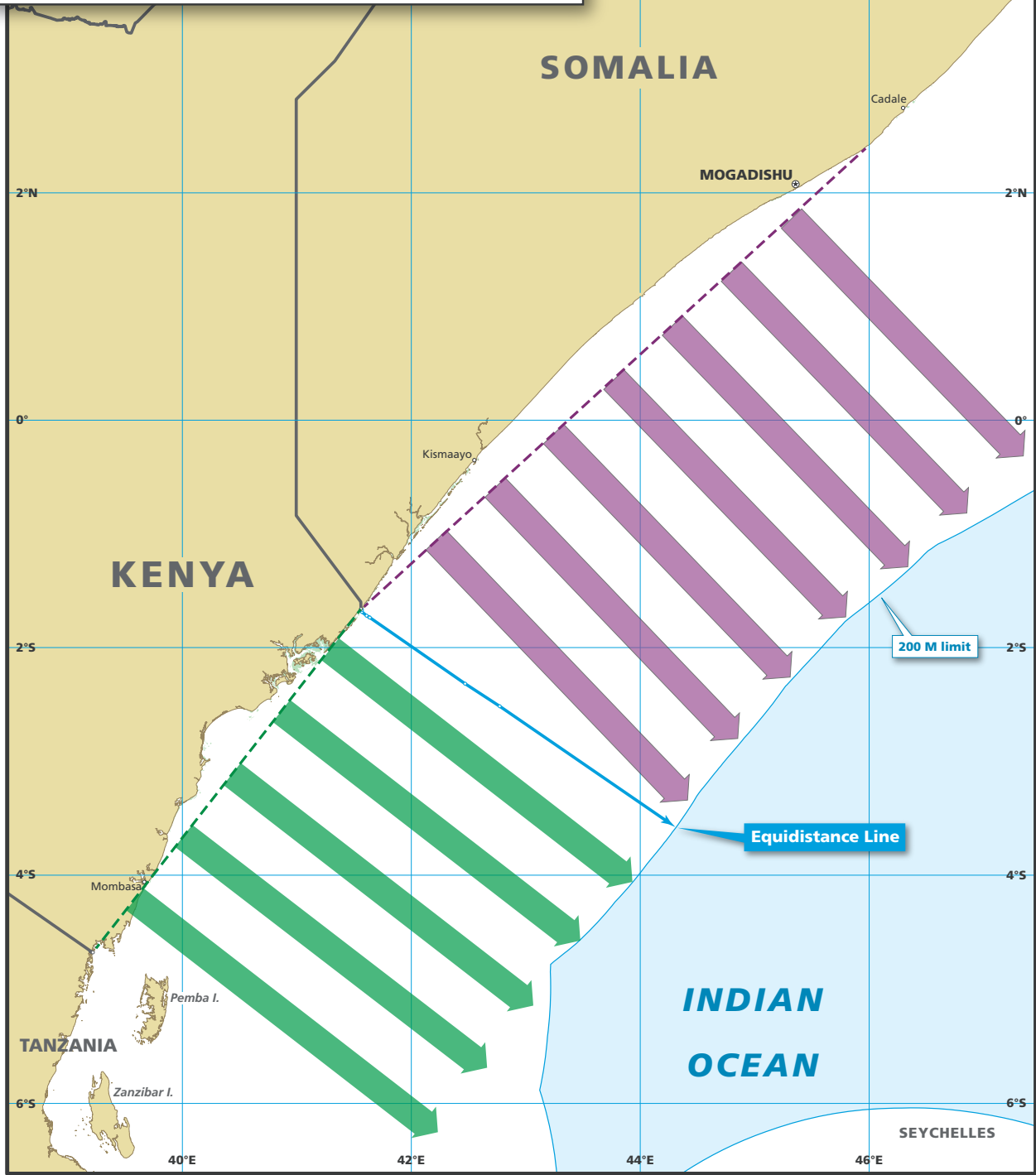


Figure 6.11

**Mercator Projection
WGS-84 Datum**
(Scale accurate at 2°S)

The image contains two horizontal scale bars. The top bar is labeled 'Nautical Miles' and has major tick marks at 0, 50, 100, 150, and 200. The bottom bar is labeled 'Kilometers' and has major tick marks at 0, 100, 200, 300, and 400. Both bars are black with white tick marks and labels.

High tide coastlines are based on the NGA Prototype Global Shoreline Data Base. Supplemental shoreline information was digitized from NGA charts 61210, 61220, 61230, 61240, 61250, 61260, 61270, 61280, 62050, 62070, 62080 and 62090.

The map illustrates the maritime boundary between Kenya and Tanzania in the Indian Ocean. The division is based on equidistance, with the following areas and percentages:

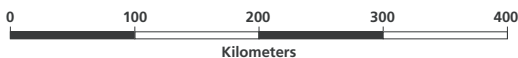
- Kenya:** 110,236 sq. km. (51.5%)
- Tanzania:** 103,627 sq. km. (48.5%)

The map also shows the 200 M limit and the division based on equidistance. Key locations include Mogadishu, Kismaayo, Mombasa, Pemba I., Zanzibar I., and the Seychelles. The map includes a coordinate grid with latitude and longitude lines.

Figure 6.12

USING KENYA'S PARALLEL CLAIM

(Scale accurate at 2°S)



Supplemental shoreline information was digitized from NGA charts 61210, 61220, 61230, 61240, 61250, 61260, 61270, 61280, 62050, 62070, 62080 and 62090.

Prepared by: International Mapping

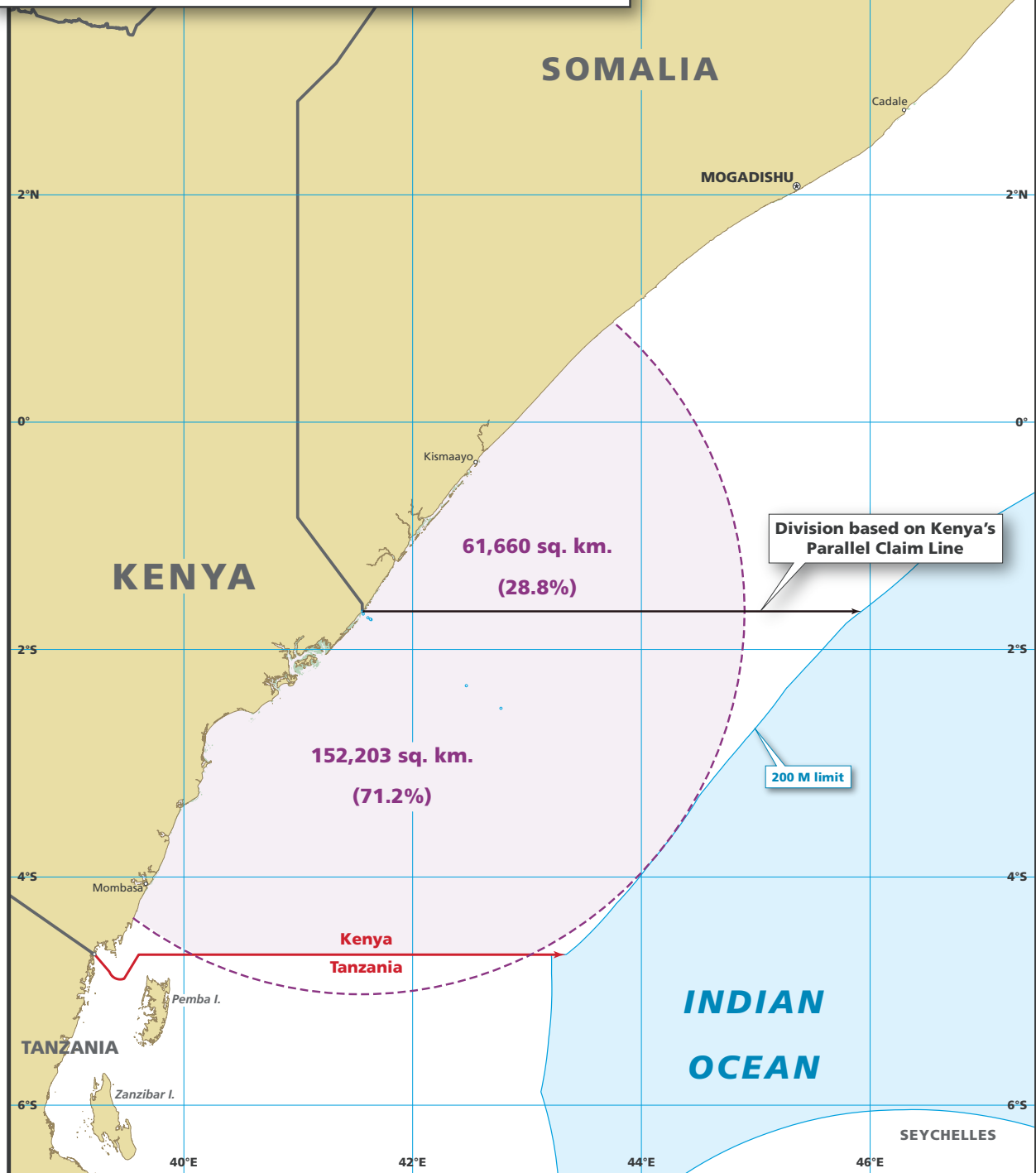


Figure 6.13

THE LIMIT OF SOMALIA'S CONTINENTAL SHELF AS SUBMITTED TO THE CLCS (JULY 2015)

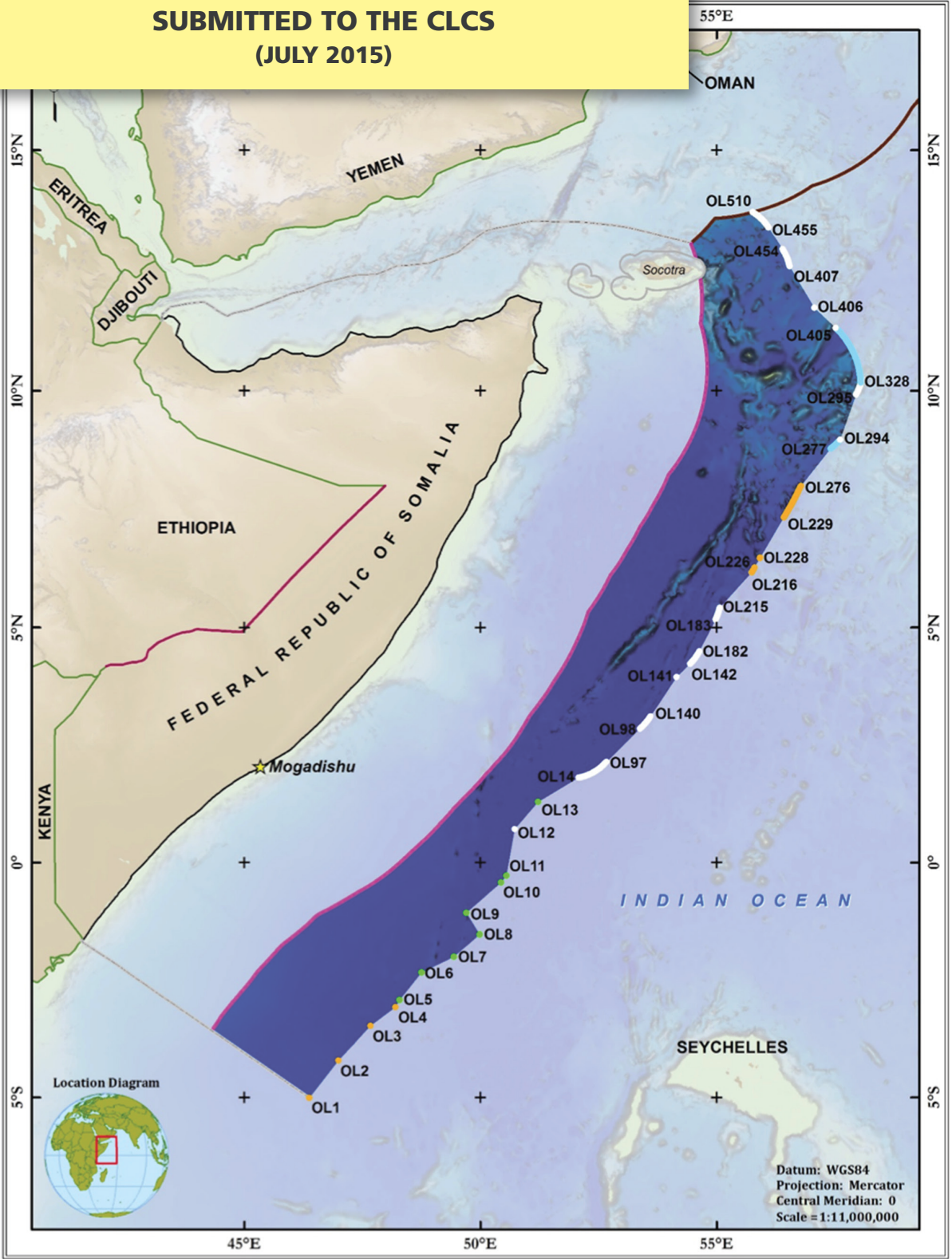


Figure 7.1



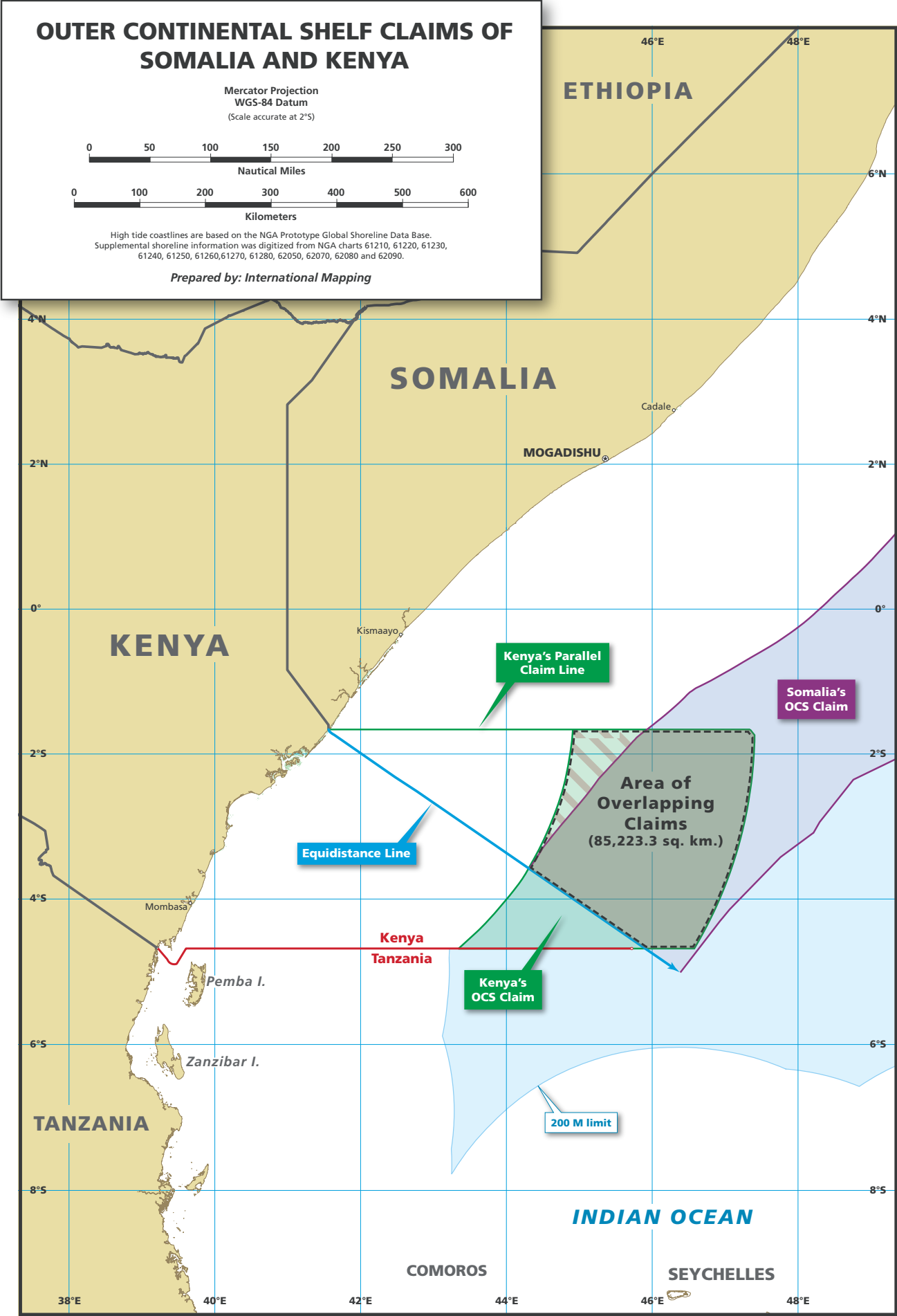
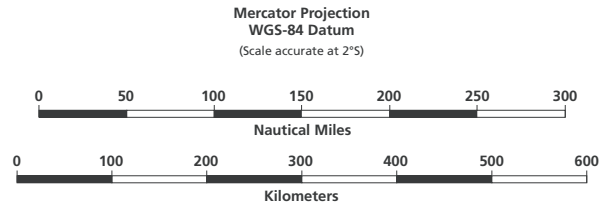


Figure 7.3

OVERLAP BETWEEN SOMALIA'S EEZ AND KENYA'S CLAIM BEYOND 200 M



High tide coastlines are based on the NGA Prototype Global Shoreline Data Base. Supplemental shoreline information was digitized from NGA charts 61210, 61220, 61230, 61240, 61250, 61260, 61270, 61280, 62050, 62070, 62080 and 62090.

Prepared by: International Mapping

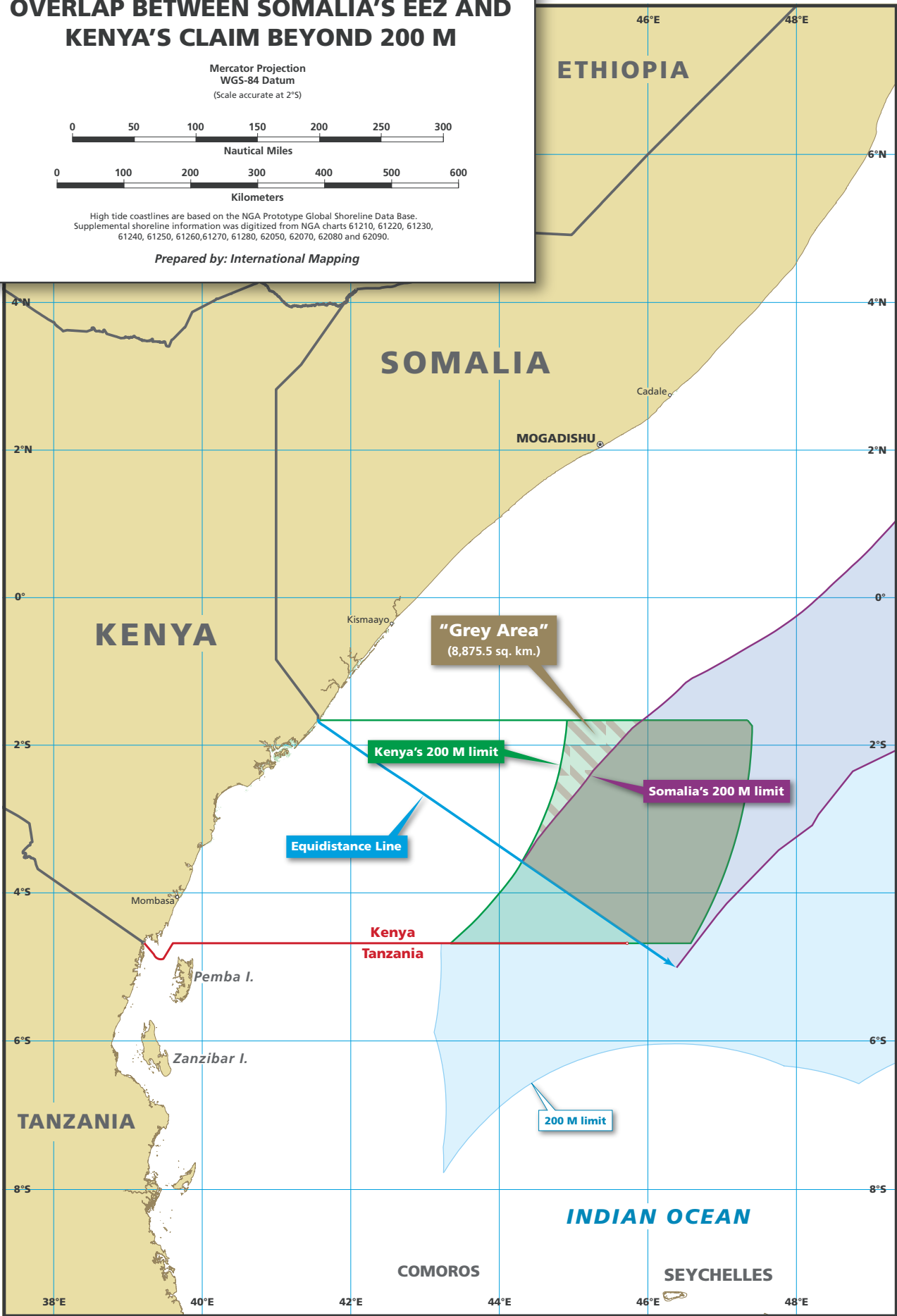
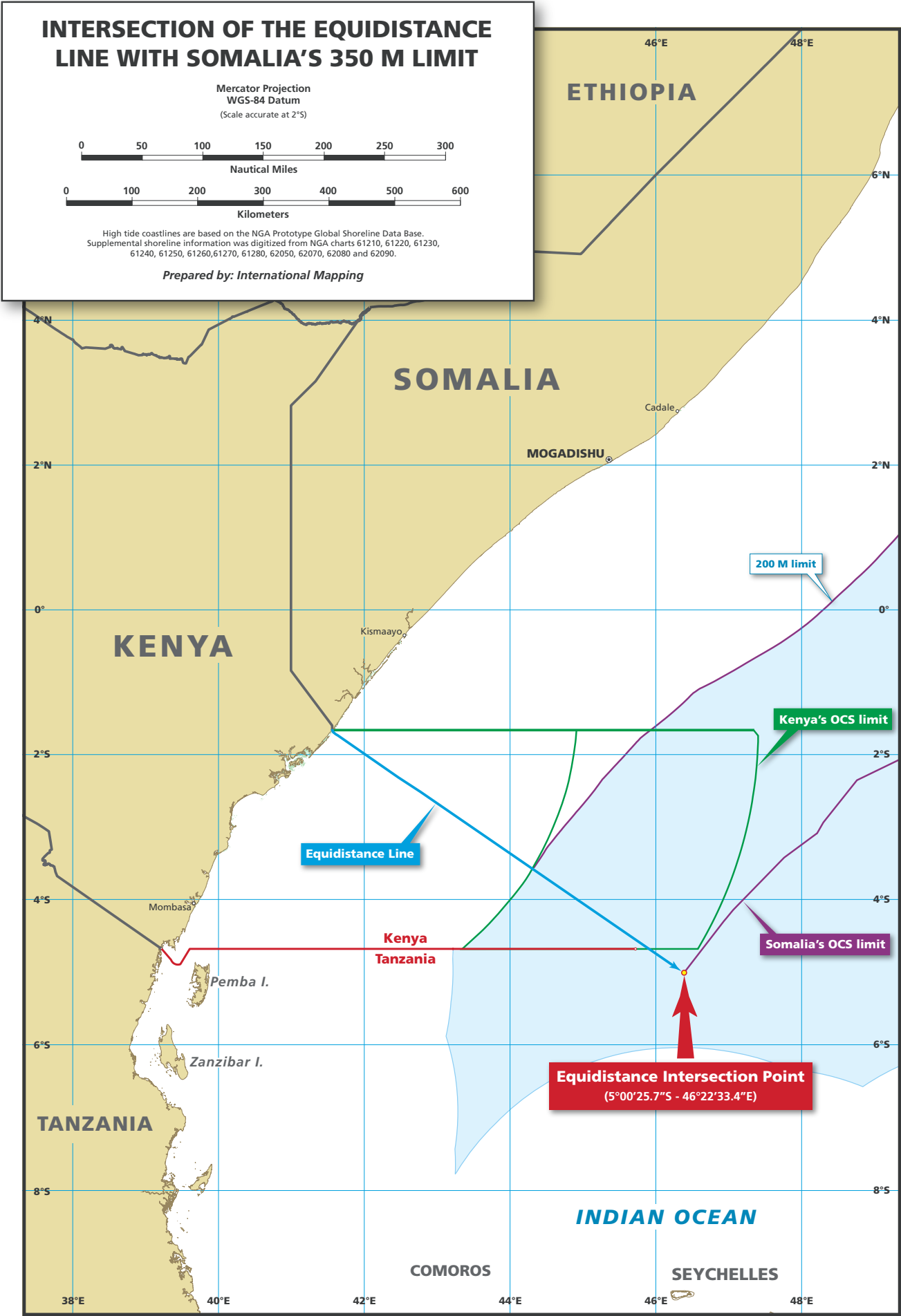
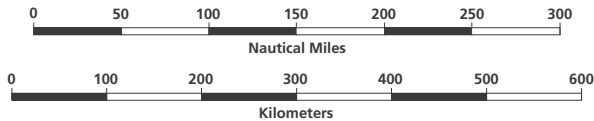


Figure 7.4



SOMALIA'S COASTAL PROJECTION IS CUT-OFF BY KENYA'S PROPOSAL

Mercator Projection
WGS-84 Datum
(Scale accurate at 2°S)



High tide coastlines are based on the NGA Prototype Global Shoreline Data Base.
Supplemental shoreline information was digitized from NGA charts 61210, 61220, 61230, 61240, 61250, 61260, 61270, 61280, 62050, 62070, 62080 and 62090.

Prepared by: International Mapping

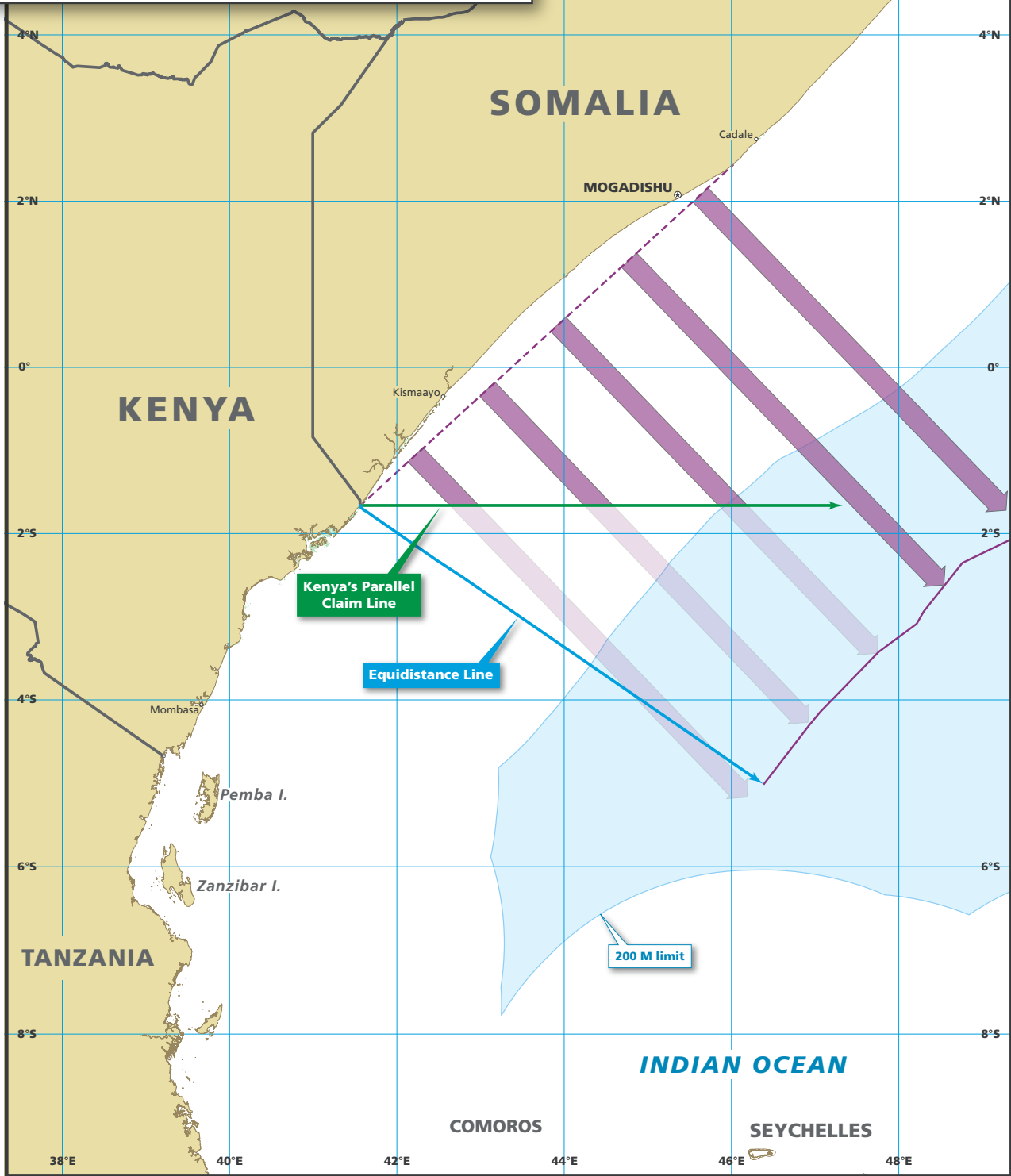
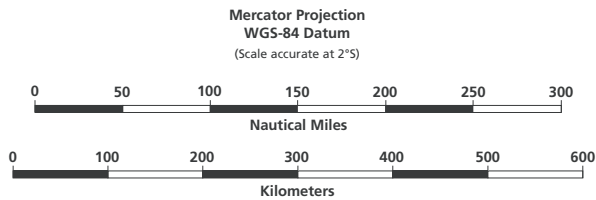


Figure 7.6

ANY CUT-OFF KENYA SUFFERS IS A RESULT OF ITS AGREEMENT WITH TANZANIA



High tide coastlines are based on the NGA Prototype Global Shoreline Data Base.
Supplemental shoreline information was digitized from NGA charts 61210, 61220, 61230, 61240, 61250, 61260, 61270, 61280, 62050, 62070, 62080 and 62090.

Prepared by: International Mapping

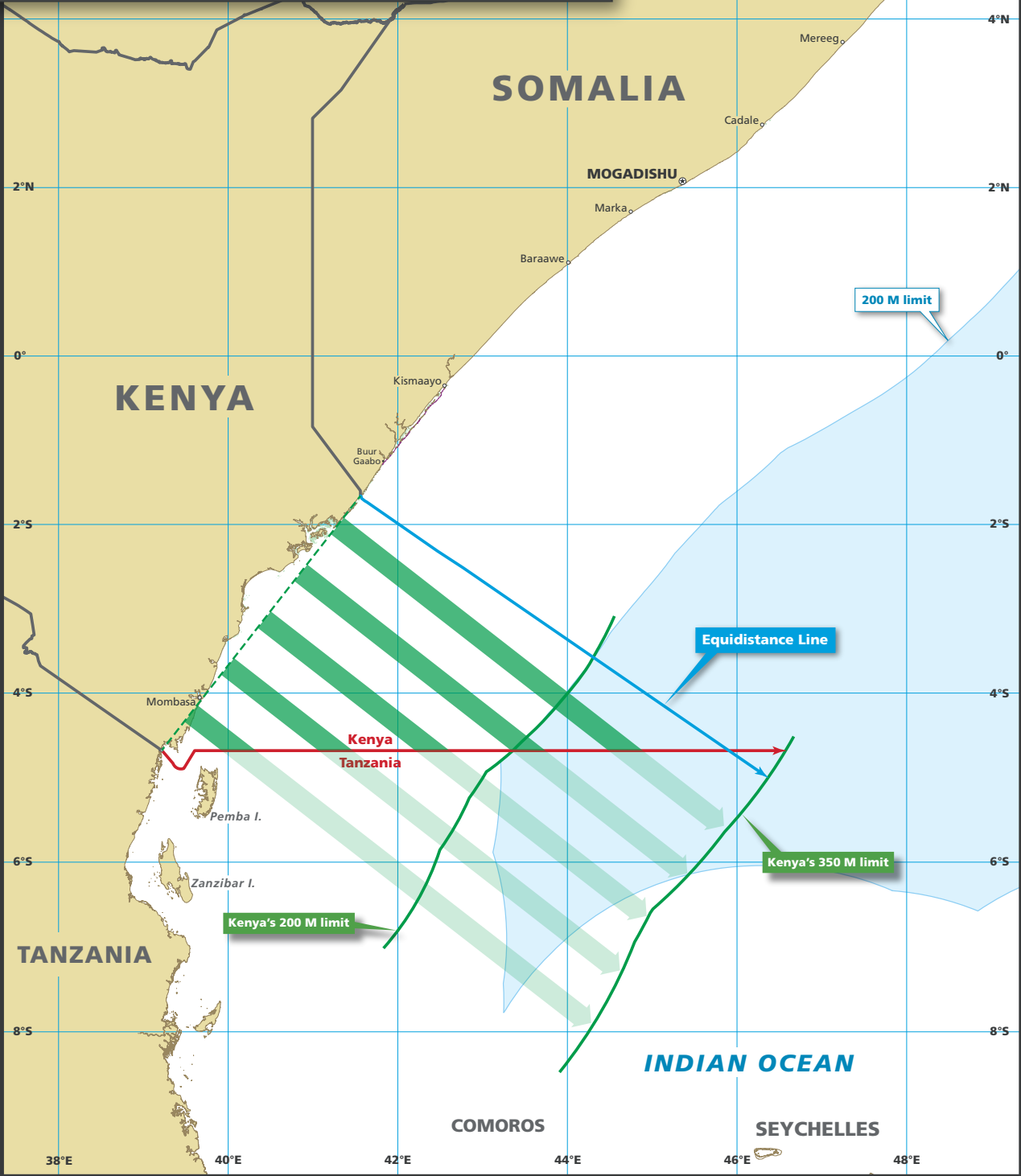
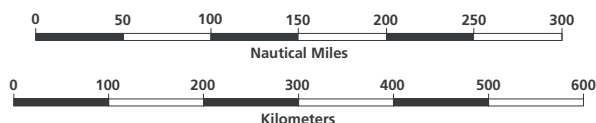


Figure 7.7

EQUIDISTANCE WOULD HAVE PROVIDED KENYA A MUCH LARGER AREA OF THE CONTINENTAL SHELF BEYOND 200 M

Mercator Projection
WGS-84 Datum
(Scale accurate at 2°S)



High tide coastlines are based on the NGA Prototype Global Shoreline Data Base. Supplemental shoreline information was digitized from NGA charts 61210, 61220, 61230, 61240, 61250, 61260, 61270, 61280, 62050, 62070, 62080 and 62090.

Prepared by: International Mapping

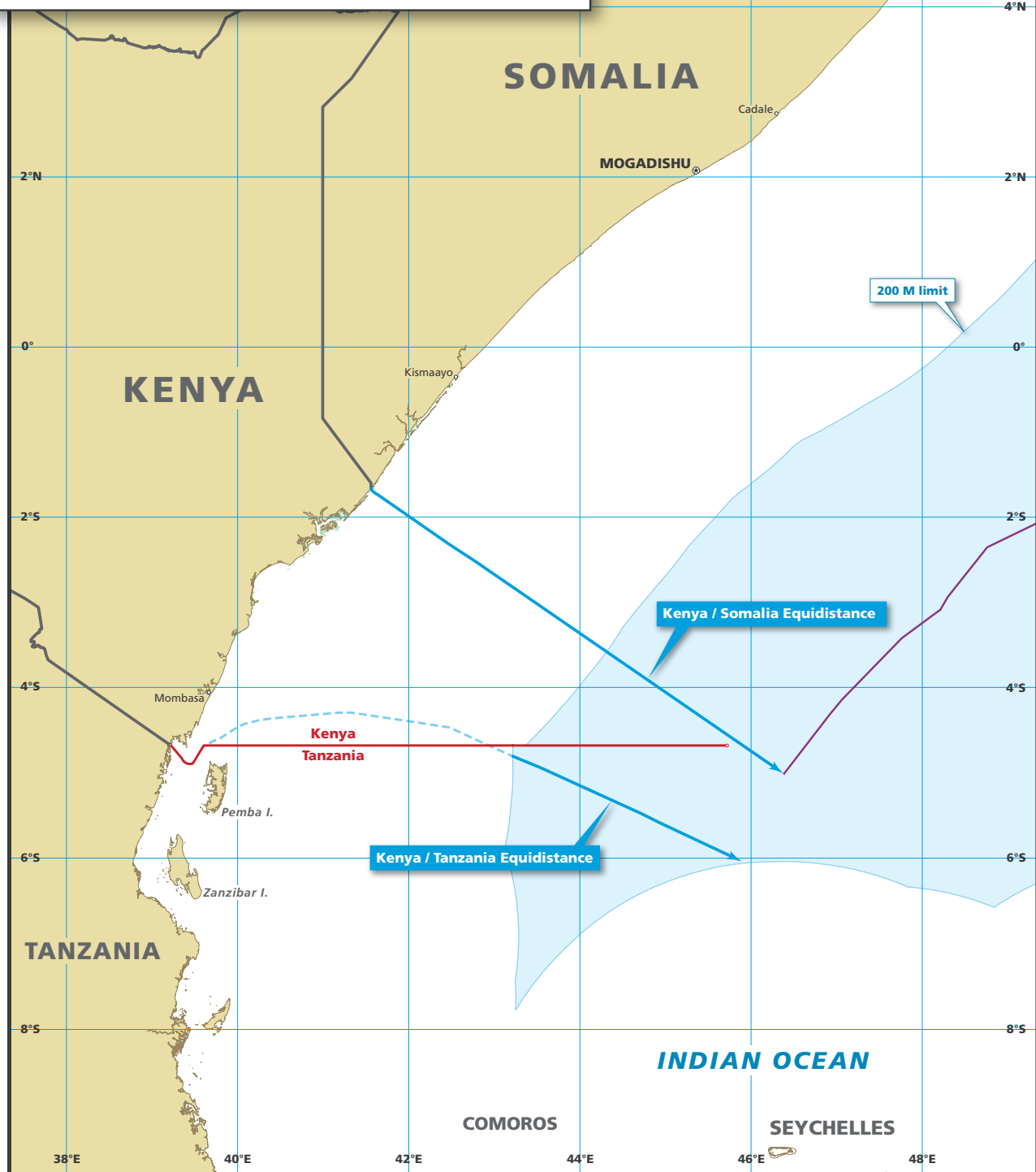


Figure 7.8

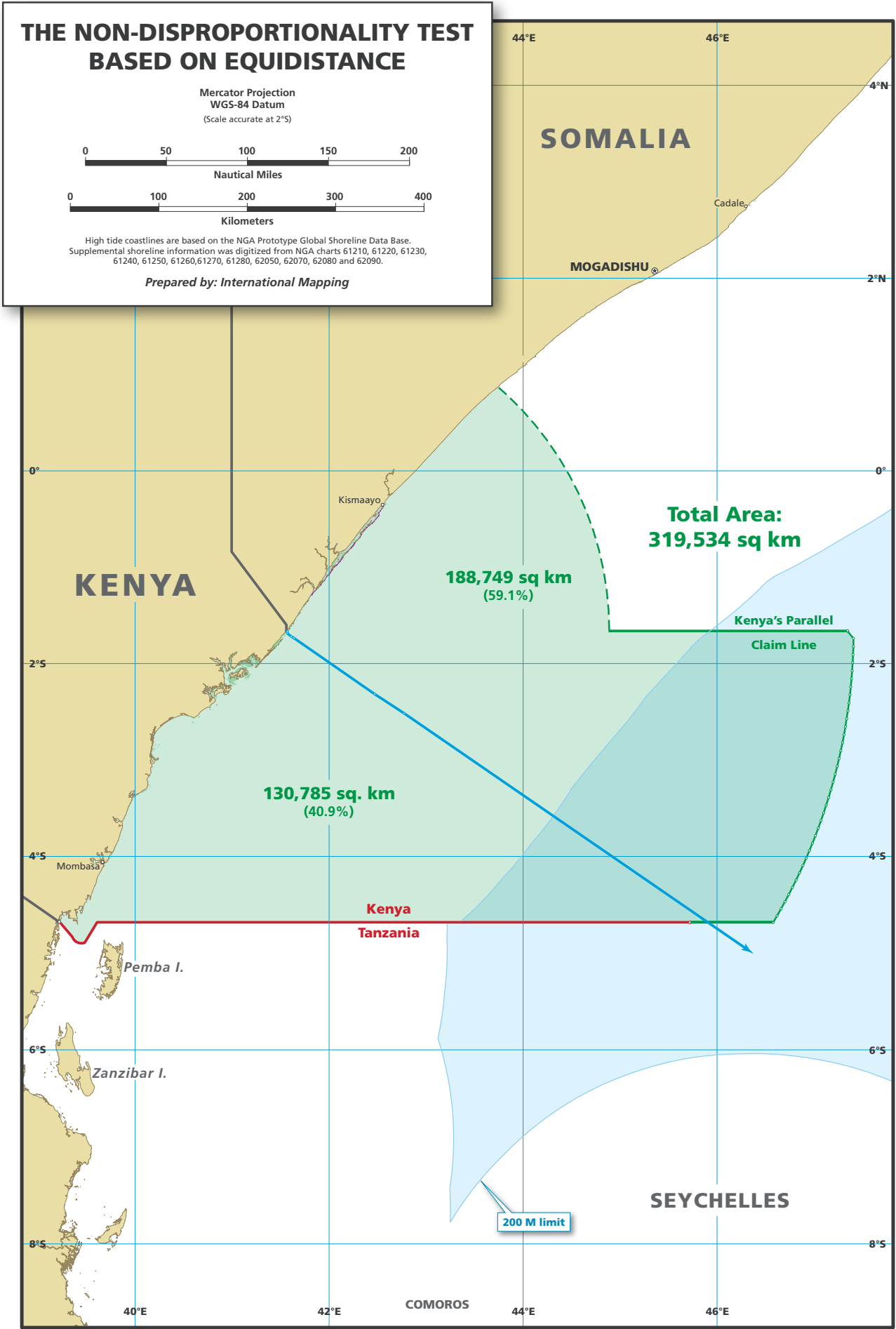


Figure 7.9

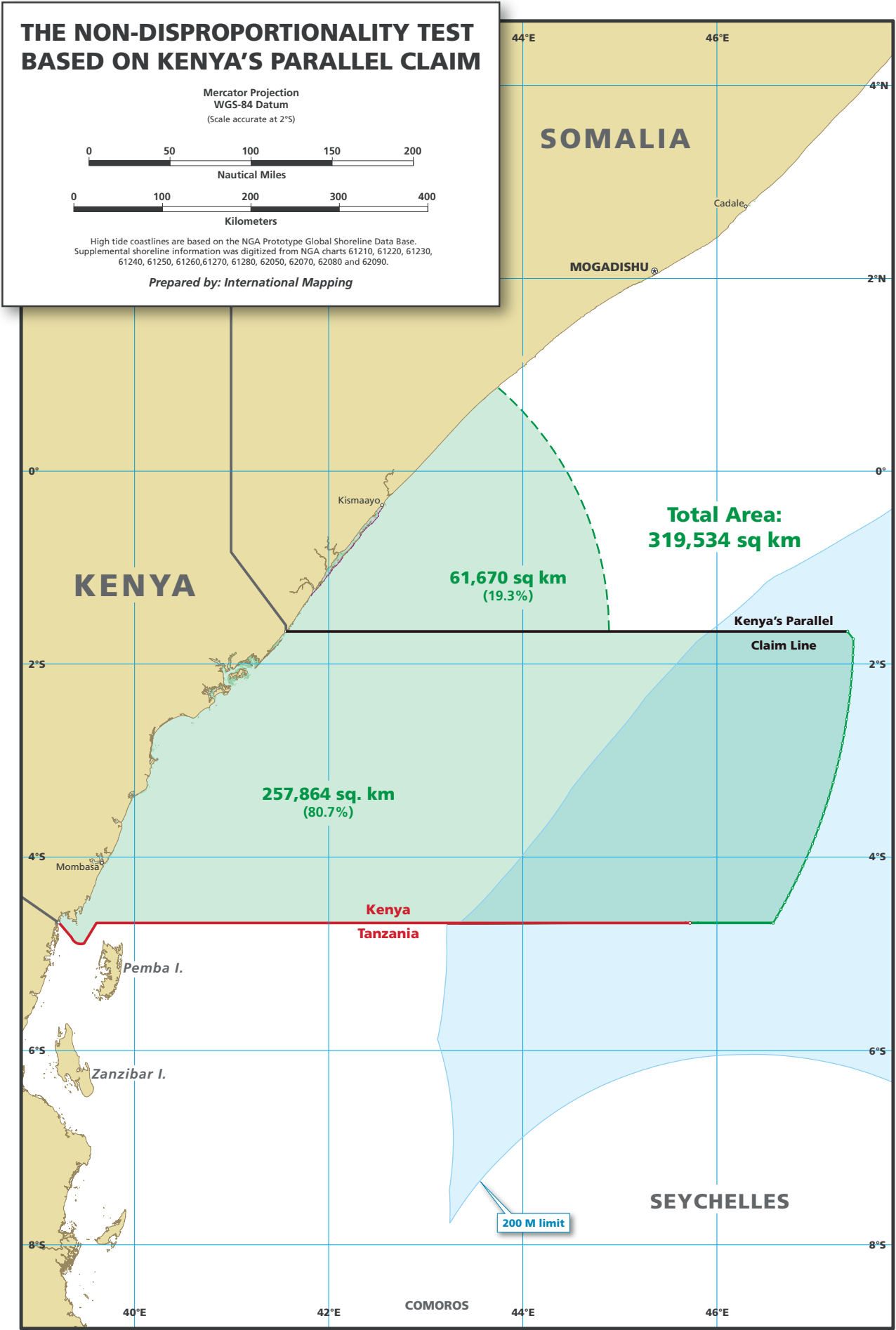


Figure 7.10

Mercator Projection
WGS-84 Datum
(Scale accurate at 2°S)

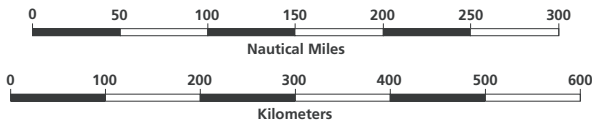
The scale bar consists of two horizontal lines. The top line is labeled 'Nautical Miles' and has major tick marks at 0, 50, 100, 150, 200, 250, and 300. The bottom line is labeled 'Kilometers' and has major tick marks at 0, 100, 200, 300, 400, 500, and 600.

Prepared by: International Mapping



AREA OF CONTINENTAL SHELF WITHIN
SOMALIA'S OCS LIMIT AND SOUTH OF
KENYA'S OCS CLAIM

Mercator Projection
WGS-84 Datum
(Scale accurate at 2°S)



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Prepared by: International Mapping

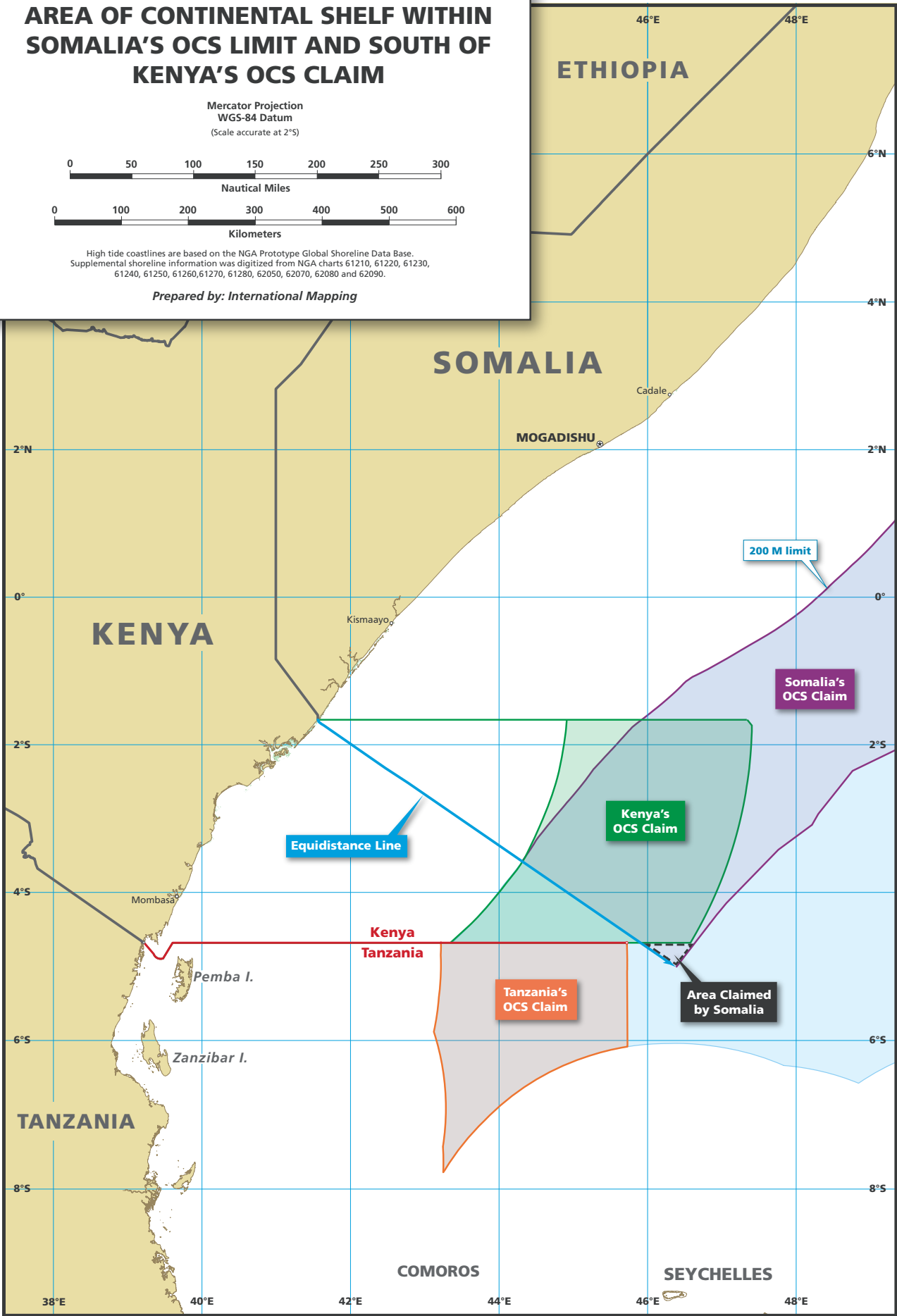
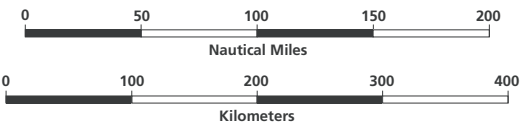


Figure 7.12

KENYA'S OFF-SHORE OIL CONCESSION BLOCKS

Mercator Projection
WGS-84 Datum
(Scale accurate at 2°S)



High tide coastlines are based on the NGA Prototype Global Shoreline Data Base.
Supplemental shoreline information was digitized from NGA charts 61210, 61220, 61230, 61240, 61250, 61260, 61270, 61280, 62050, 62070, 62080 and 62090.

Prepared by: International Mapping

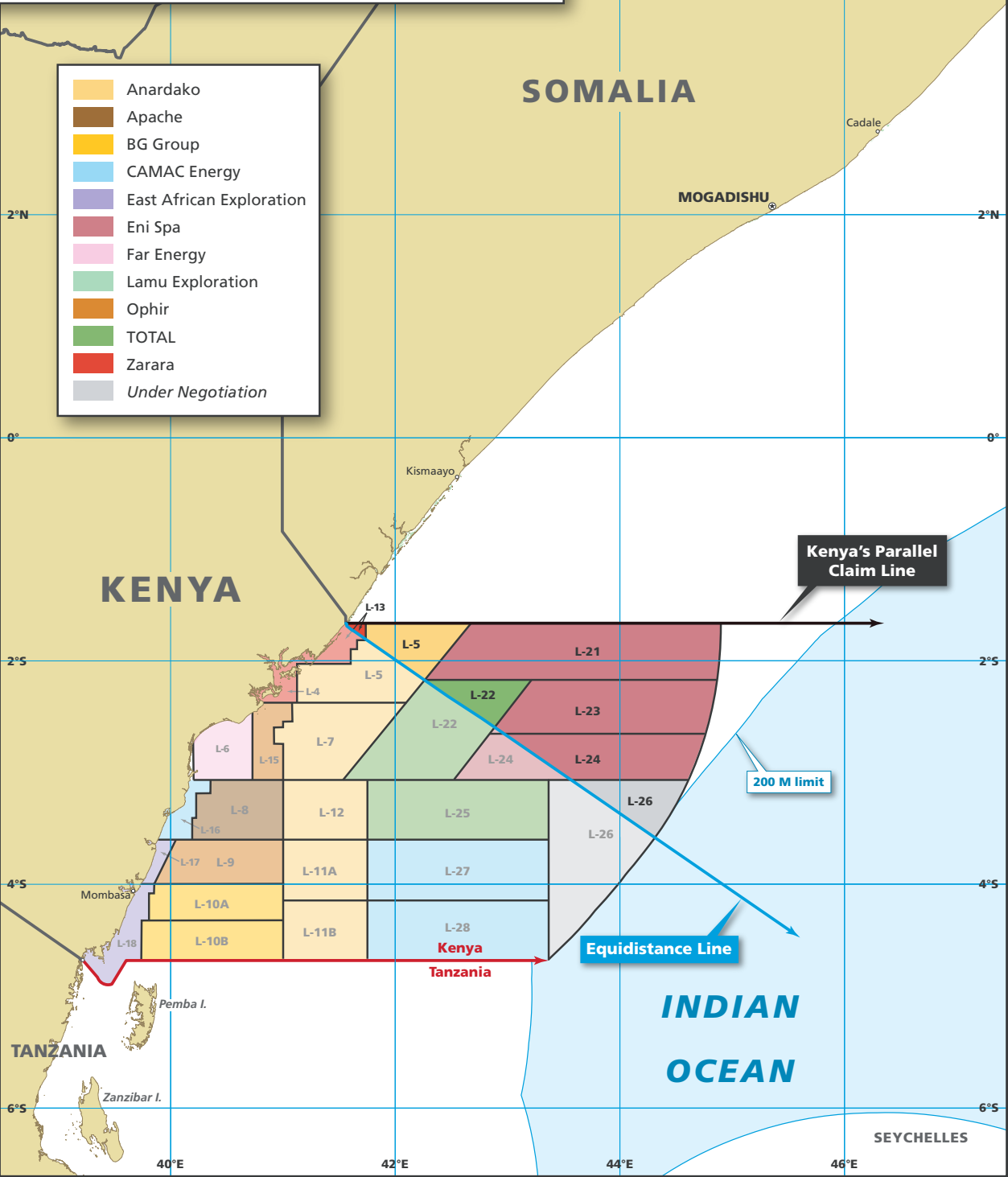
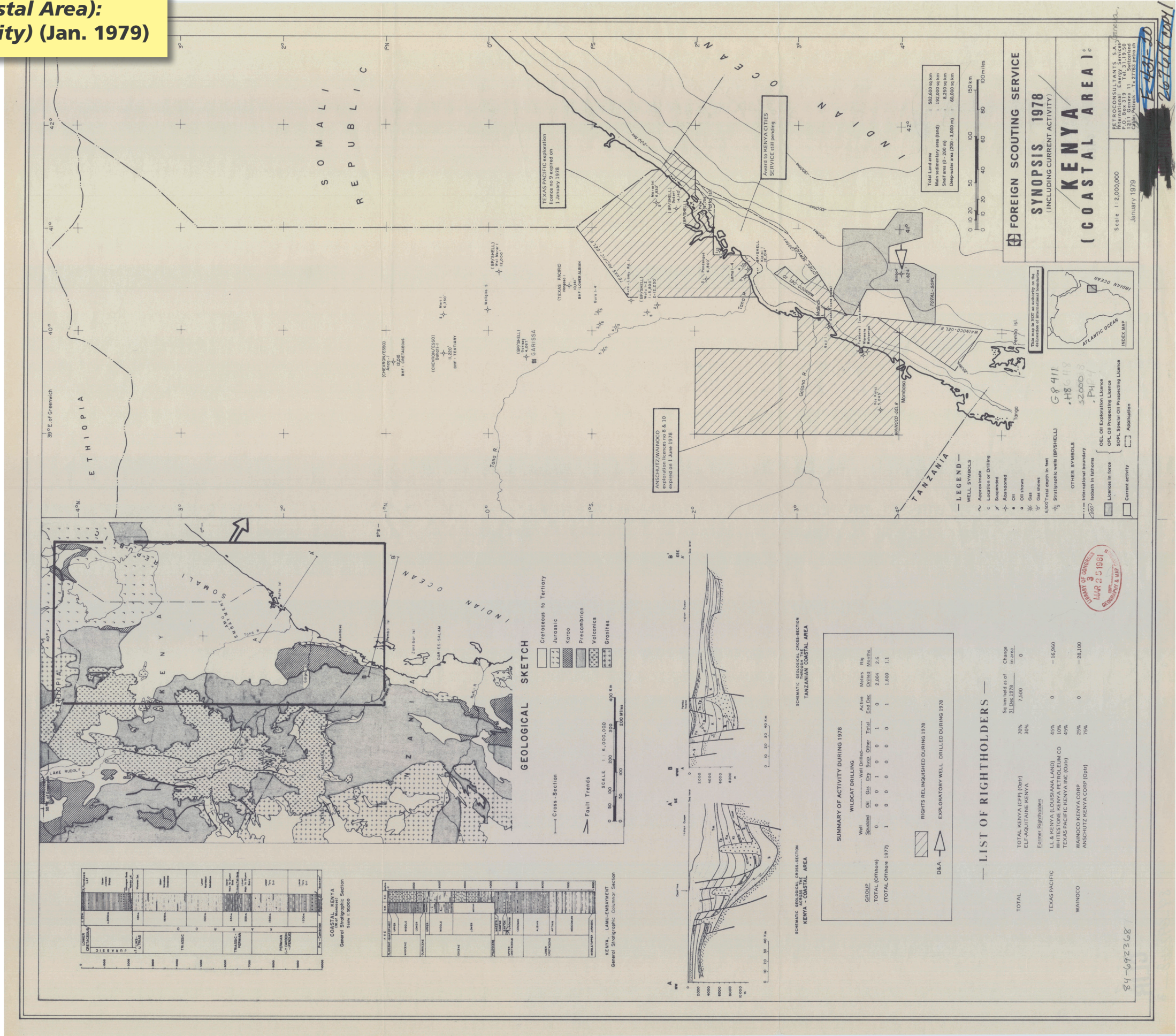
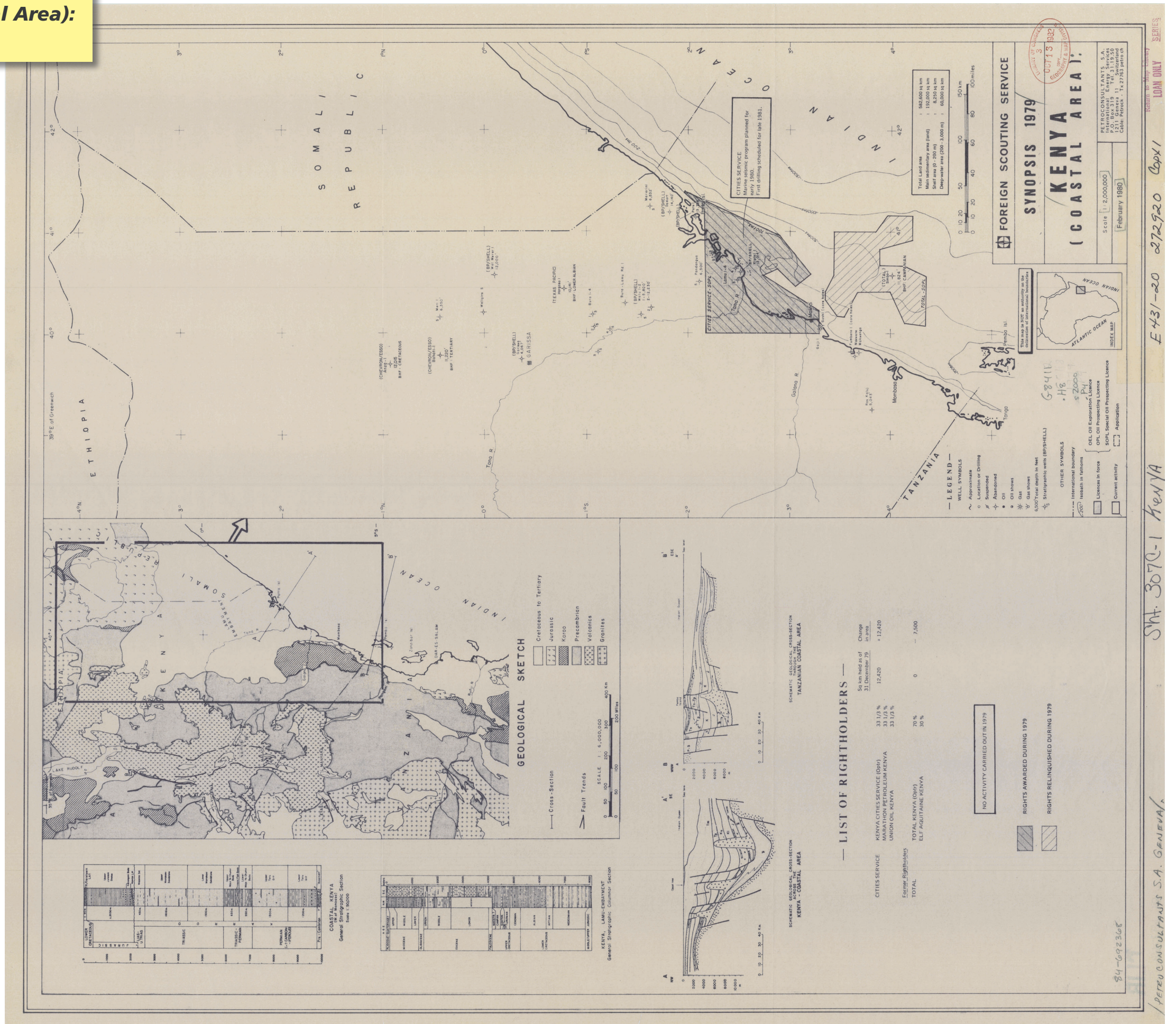


Figure 8.1

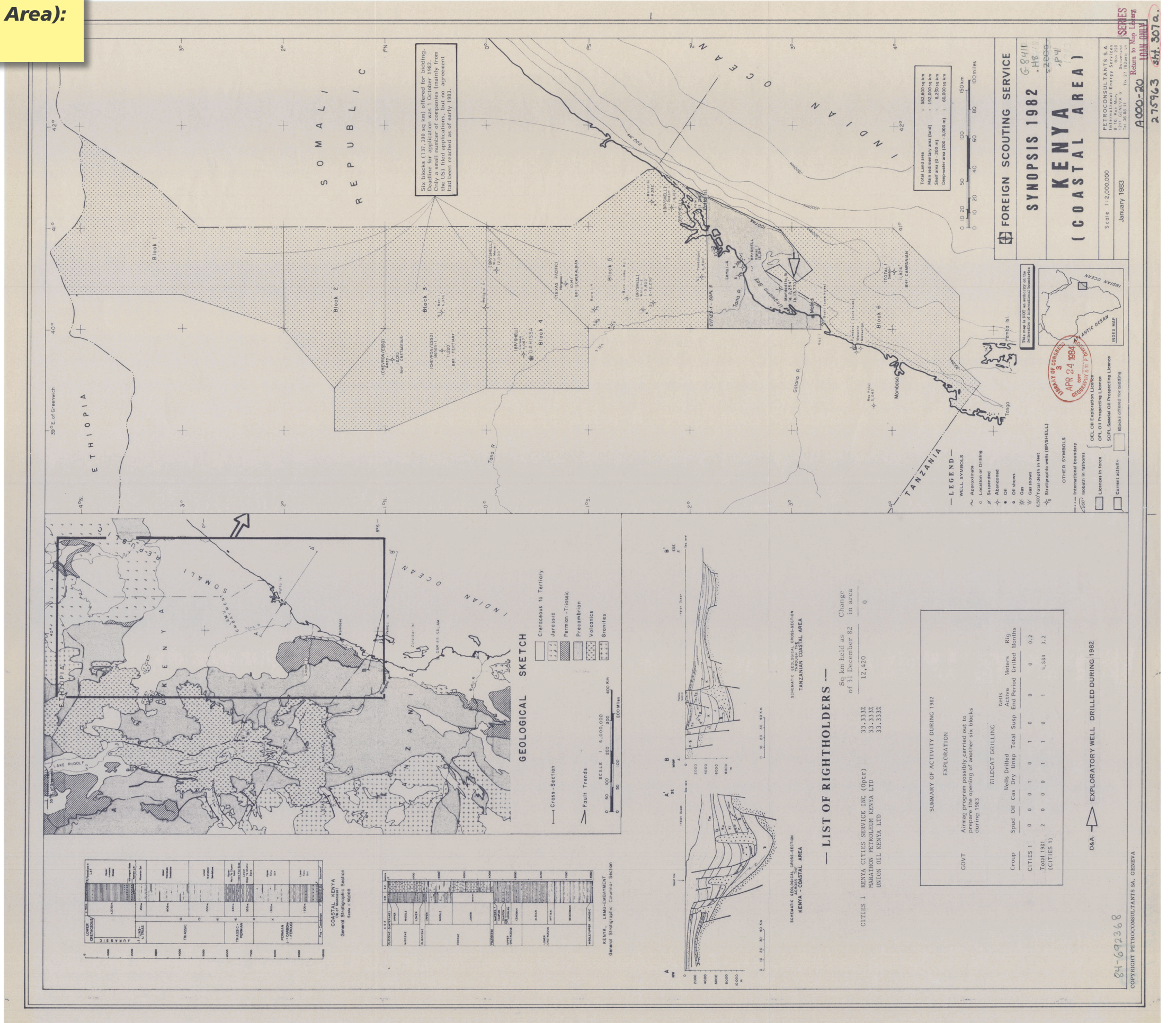
**Petroconsultants S.A., Kenya (Coastal Area):
Synopsis 1978 (Including Current Activity) (Jan. 1979)**

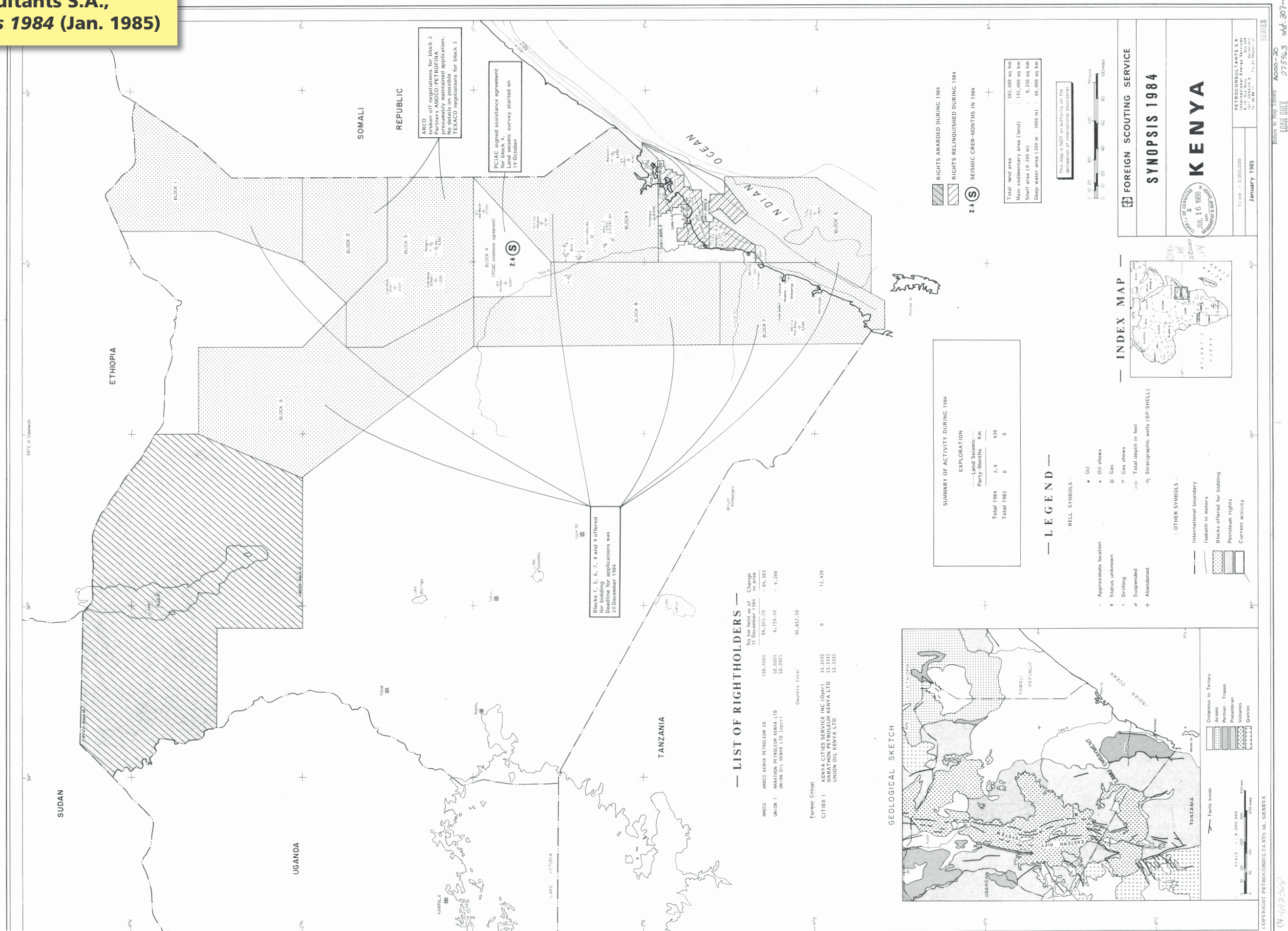


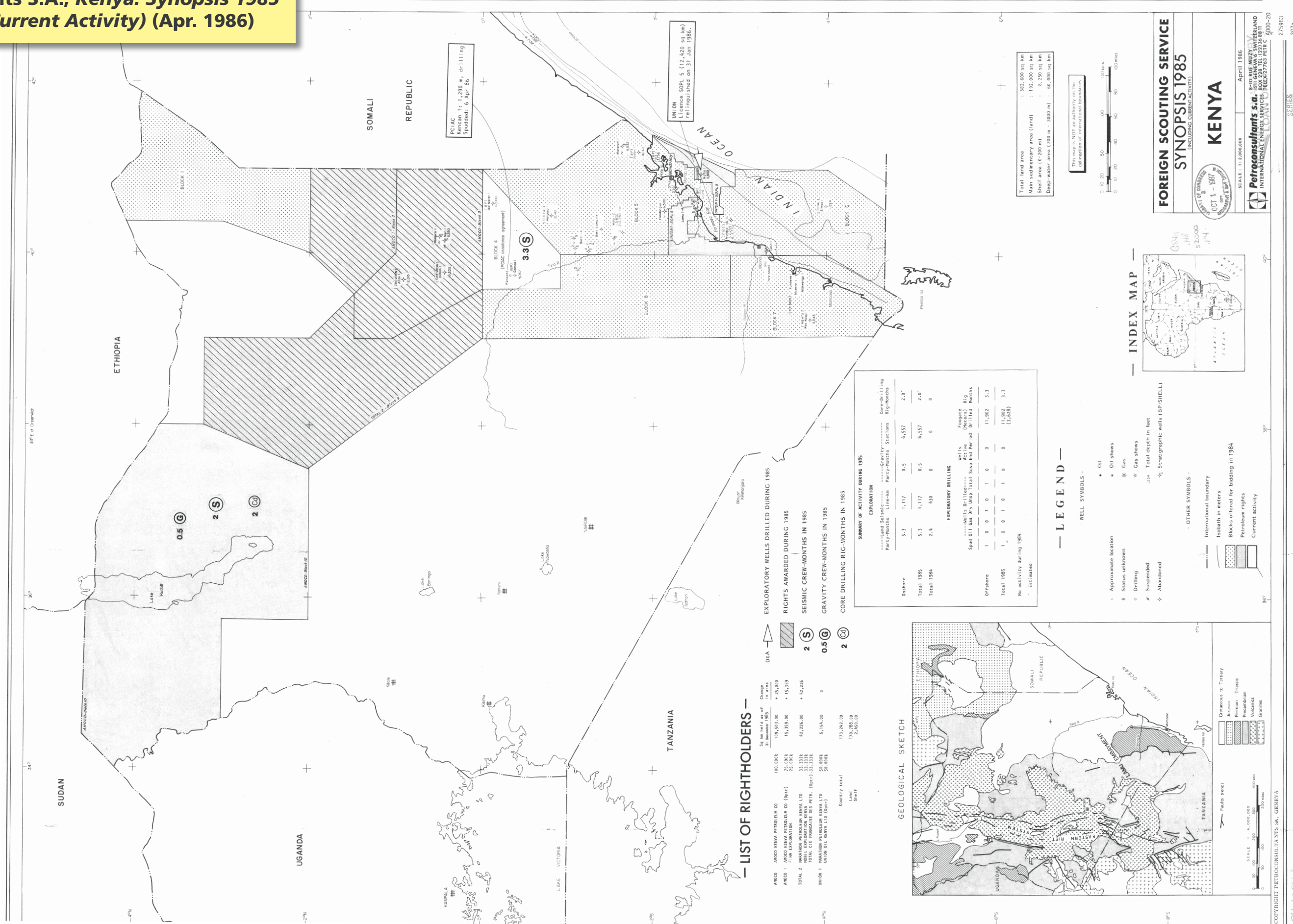
**Petroconsultants S.A., Kenya (Coastal Area):
Synopsis 1979 (Feb. 1980)**



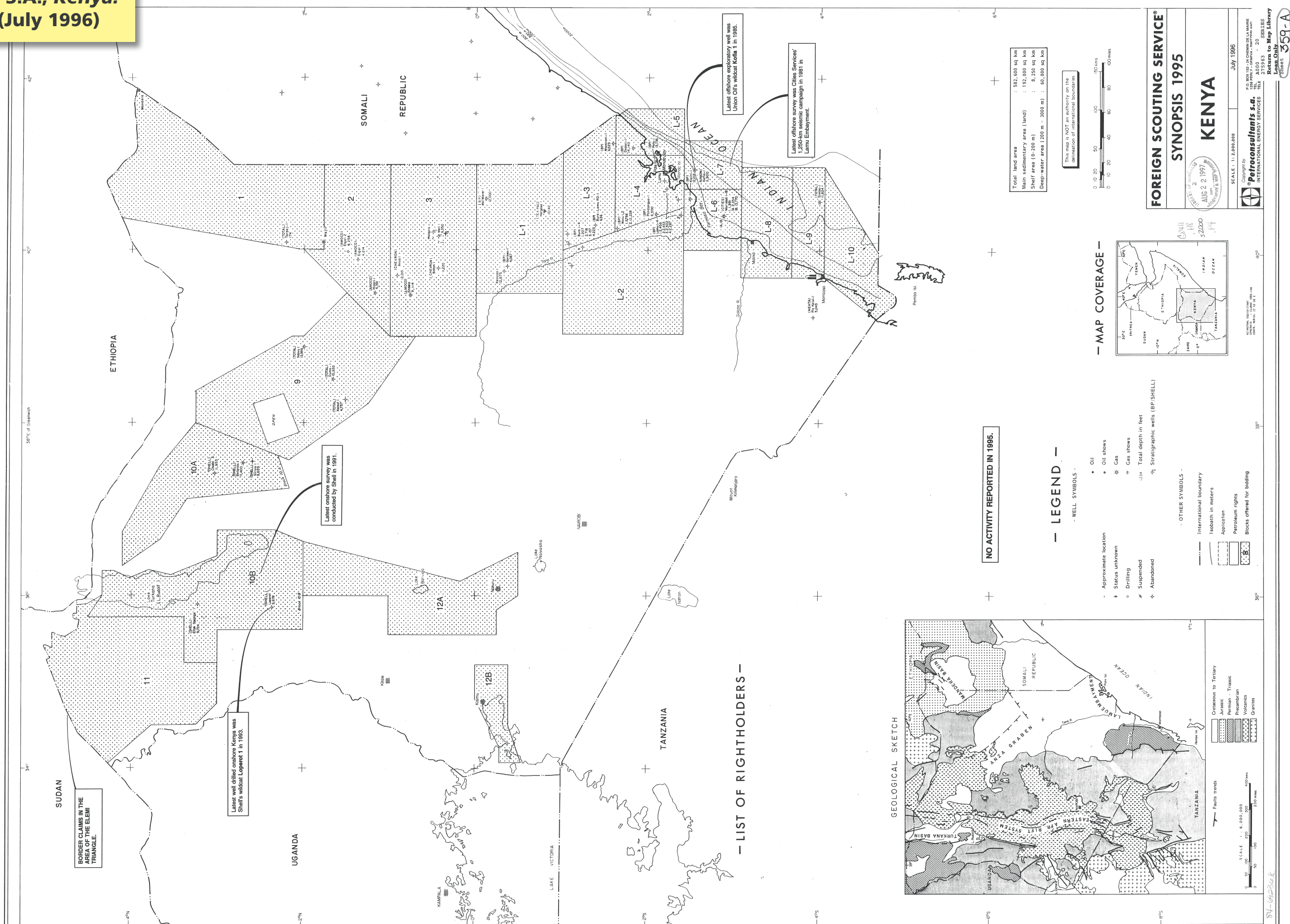
**Petroconsultants S.A., Kenya (Coastal Area):
Synopsis 1982 (Jan. 1983)**



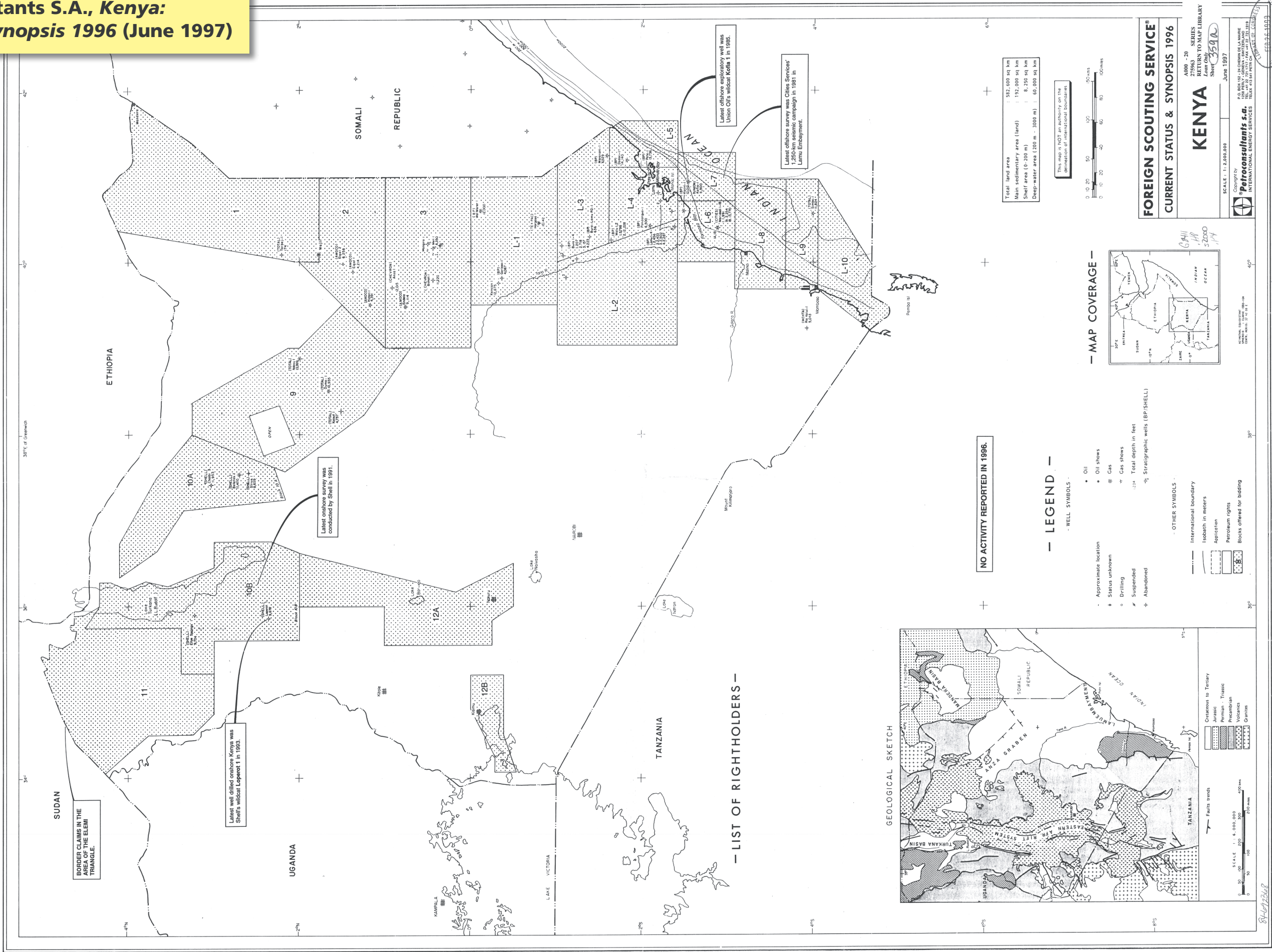




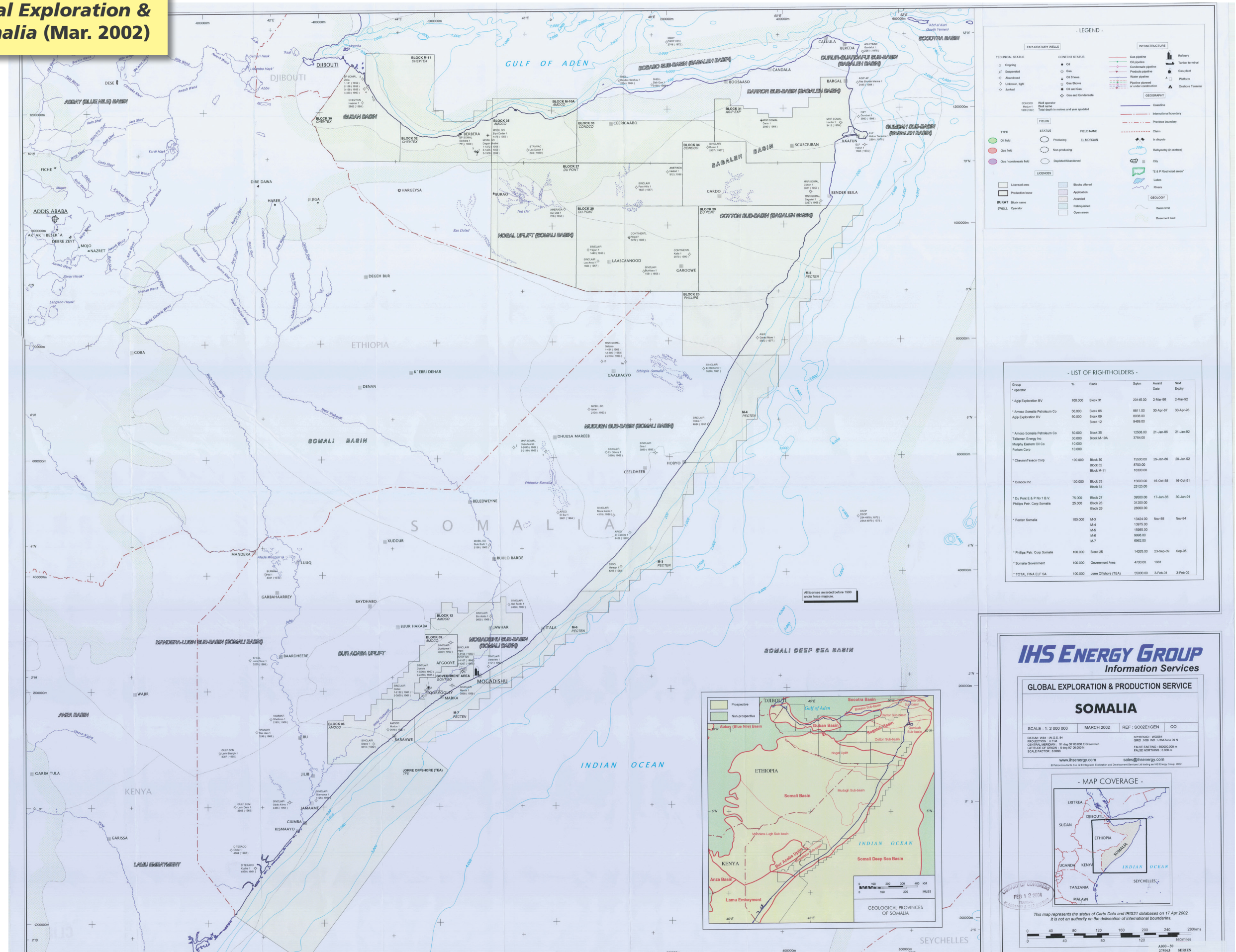




Petroconsultants S.A., Kenya: Current Status & Synopsis 1996 (June 1997)

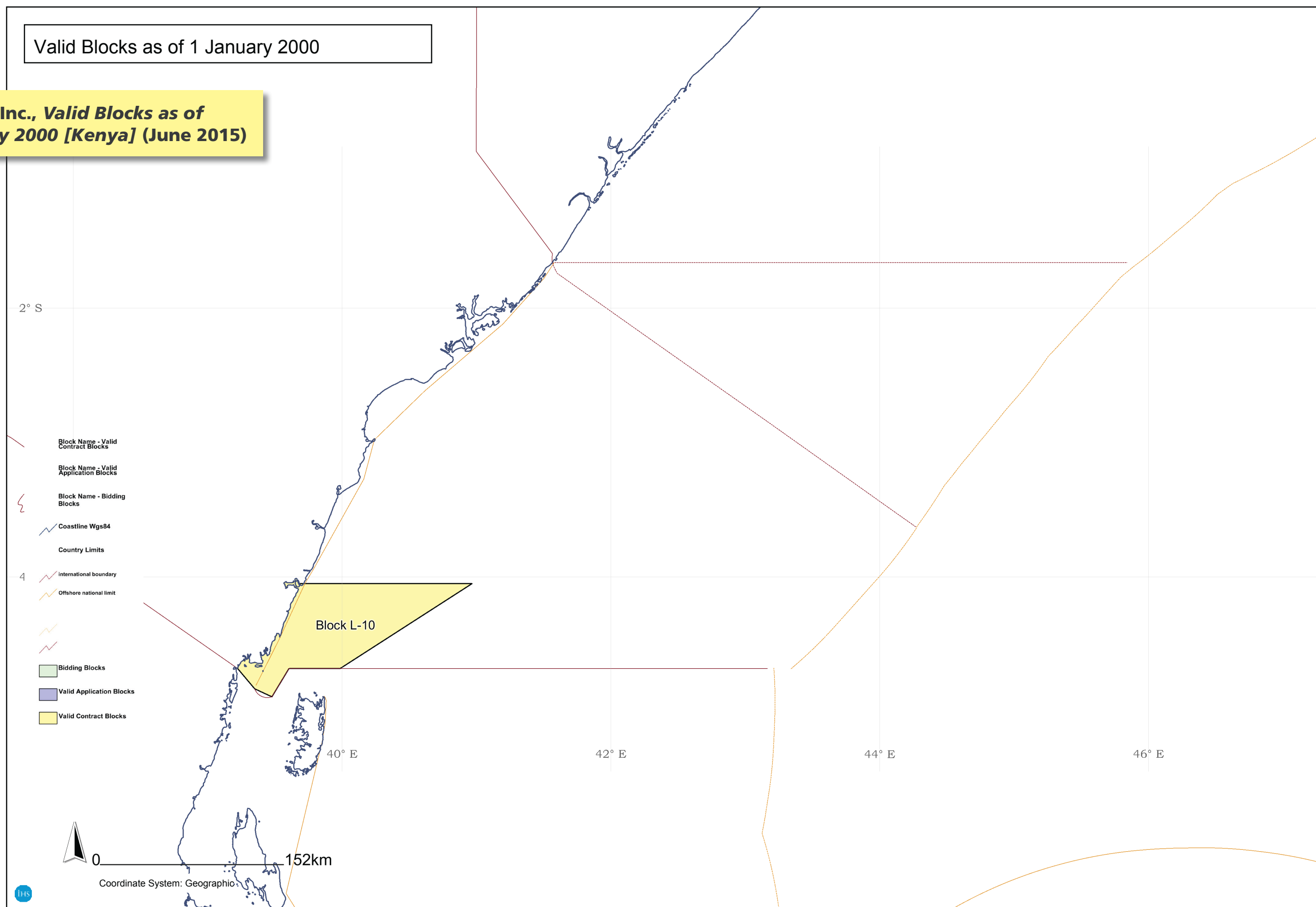


IHS Energy Group, *Global Exploration & Production Service: Somalia* (Mar. 2002)



Valid Blocks as of 1 January 2000

**IHS Inc., Valid Blocks as of
1 January 2000 [Kenya] (June 2015)**



Valid Blocks as of 1 January 2001

**IHS Inc., Valid Blocks as of
1 January 2001 [Kenya] (June 2015)**

