THE LEGAL ADVISER
DEPARTMENT OF STATE
WASHINGTON

November 20, 2002

Sir,

At the November 6 meeting of the agents of the Islamic Republic of Iran and the United States of America regarding the *Case Concerning Oil Platforms (Islamic Republic of Iran v. United States of America)*, I indicated the intention of the United States to file one or two additional documents in support of its written pleadings in this case. Accordingly, in accordance with Article 56 of the Rules of Court, I have the honor to submit in support of the written pleadings of the United States in this case the following two documents:

- Report of Deborah Martin, November 18, 2002 (Exhibit 262)
- Diplomatic Note from the Royal Norwegian Embassy, Washington, D.C., to the United States Department of State, November 20, 2002 (Exhibit 263)

One original and one hundred and twenty-five copies of each document are being delivered to the Registry. I certify that the copies of these documents are true copies.

With respect to the Report of Ms. Martin, the United States had intended to address the subject of this report during the oral proceedings without having filed a written report in advance. We are now of the view, including after consideration of the letter of the Agent of Iran to you dated September 18, 2001, that the Court's authorization of the production of this document at this time will assist the Court and the parties by facilitating the most efficient presentation by the United States during the oral proceedings and should lend greater focus to the

Mr. Philippe Couvreur,
Registrar,
International Court of Justice,
The Hague.

AGENT OF THE GOVERNMENT OF THE ISLAMIC REPUBLIC OF IRAN

The Hague

IN THE NAME OF GOD

20 January 2003
No. 34666 30 Dey 1381

Re: Oil Platforms (Islamic Republic of Iran v. United States of America

Sir,

I have the honour to refer to your letter dated 22 November 2002 by which you transmitted to me a copy of a letter dated 20 November 2002 from the Agent of the United States, together with copies of two new documents which the United States desired to produce under Article 56 of the Rules of Court, and requested my Government's views.

Despite the unreasonable delay by the United States in submitting the new documents in question, which could have been produced at an earlier stage of the proceedings, the Government of the Islamic Republic of Iran does not object to the late production of these documents.

Pursuant to Article 56, paragraph 3, of the Rules of Court, the Government of the Islamic Republic of Iran is hereby submitting comments prepared by Mohammad Youssefi on Exhibit 262 filed by the United States. The Government of the Islamic Republic of Iran respectfully requests that these comments be made part of the record in the case.

Fifty copies of the comments are being filed with the Registry. The original will follow shortly. I certify that the copies of the comments are accurate copies.

The Government of the Islamic Republic of Iran reserves the right, as necessary, to make additional comments on the new documents submitted by the United States during the oral proceedings.

Accept, Sir, the assurances of my highest consideration.

M.H. Zahedin-Labbaf
Agent of the Islamic
Republic of Iran before
the International Court
of Justice

H.E. Mr. Philippe Couvreur
Registrar,
International Court of Justice
Peace Palace,
The Hague

EXHIBIT 262

Report of Deborah Martin, November 18, 2002

REPORT OF DEBORAH MARTIN

Introduction

1. My name is Deborah Martin. I am employed as an Imagery Analyst by the National Imagery and Mapping Agency (NIMA), an agency of the United States Government. I have been employed as an Imagery Analyst for NIMA, and for its predecessor agency, the National Photographic and Interpretation Center, since 1985. In connection with this position, I have received extensive training from the U.S. Government in accepted principles and practices of imagery analysis. This has included training in identifying from overhead imagery worldwide military orders of battle (land, sea, and air armaments). My present duties and responsibilities include analyzing overhead imagery taken from satellites and aerial reconnaissance aircraft for the purpose of providing defense-related information used in the planning and conduct of military operations by the U.S. Government.

2. In addition to being knowledgeable about imagery, I am also knowledgeable about a variety of weapons and weapons systems manufactured in the United States and in other nations. I am familiar with the various missiles in the Iranian and Iraqi inventories in the 1984-1988 timeframe. At that time, both Iran and Iraq possessed and deployed the HY-2 anti-ship cruise missile. I am familiar with the HY-2 cruise missile system, including the HY-2 missile transporter, missile launcher, missile storage crates, and how the launch site is prepared and configured. In the past, my involvement with the

HY-2 cruise missile system has also included the analysis and deployment of this system in several countries.

3. I have been asked to review the images provided by the United States to the International Court of Justice in exhibits 94 and 208 and to describe what they show. In connection with my duties at NIMA, I was responsible for analyzing this same imagery at the time it was collected, and can thus confirm that the images in exhibits 94 and 208 were taken on the dates indicated. The following report contains my analysis of these images.

Background Information

4. The following information pertains to Graphics 1-5 in Exhibit 94 and Images 3-13 in Exhibit 208 to the pleadings of the United States in the Oil Platforms Case before the International Court of Justice. Each of these images was taken by an overhead satellite or an aerial reconnaissance aircraft and rendered onto photographic film and paper prints for use in this Court. For the overhead satellite images, the film images were scanned into a computer using a digital scanner in order to produce these prints referred to as imagery derived products (IDPs).

5. IDPs may be printed at various degrees of resolution. Resolution levels are analogous to different settings on a zoom lens for a camera; as levels of resolution increase, it becomes possible to identify smaller features within the image.

6. The IDPs in Exhibits 94 and 208 were produced at the level of resolution approximately equivalent to the best commercial imagery that was then available. In light of recent advances in commercially available imaging technology, the IDPs in Graphics 1-5 of Exhibit 94 and Images 5-7 of Exhibit 208 have been re-printed at increased resolution, which renders the objects shown more visible. For convenience, I have attached to my affidavit a complete set of the images and IDPs that were included in Exhibits 94 and 208, substituting the aforementioned re-printed IDPs for those submitted in Exhibits 94 and 208. I have labeled these as Attachments A-U. My analysis relates to the images and IDPs attached to this affidavit.

7. The attached IDPs show HY-2 missile launching sites, HY-2 missiles, and associated equipment on territory controlled by Iran in 1987 in the area of Al Faw Peninsula. A number of factors support this conclusion. Having photographs and line drawings of the HY-2 cruise missile and associated equipment depicting their distinctive visual characteristics made it possible to identify the objects shown in the IDPs as components of and equipment associated with the HY-2 cruise missile system. After determining that the objects shown in the IDPs belonged to the HY-2 cruise missile system, several factors led to the conclusion that the HY-2 cruise missile sites shown in the IDPs were under the control of Iran: (1) knowing that in early 1986 Iran captured from Iraq the part of Al Faw area shown in the IDPs; (2) knowing that Iran had the HY-2 cruise missile system in its inventory; and (3) knowing the configuration of the standard

HY-2 cruise missile launch site, as well as the configuration of the temporary HY-2 cruise missile launch sites that were employed by Iran.

Analysis of Attachments A, B, and C

8. Attachment A (Exhibit 94, Al Faw Area), Attachment B (Exhibit 94, Al Faw Area Map Inset 1), and Attachment C (Exhibit 94, Map Inset 2) show the area generally known as Al Faw, and provide the overall geographical context for the IDPs that follow. As indicated on these images, the succeeding IDPs focus on smaller areas described in the inset boxes.

Analysis of Attachment D

9. The IDP in Attachment D (Exhibit 94, Graphic 1) was taken from a U.S. satellite on 16 October 1987, the same day as the attack on *Sea Isle City* and one day after the attack on *Sungari*. The geographical coordinates of the area shown in Attachment D are 295900N/0483410E. The IDP in Attachment D shows equipment used in launching HY-2 cruise missiles: a transporter with a canvas-covering of the kind typically used to protect a missile; a transporter without a missile; two trucks towing two HY-2 missile launchers; and other support trucks. These HY-2 weapon system components are distinctive and readily identifiable by their configuration, dimensions, and positioning for deployment. The attached IDPs show these unique characteristics.

10. Included in Exhibit 94 is a manufacturer's photograph of a HY-2 cruise missile transporter loading a missile onto a launcher and in a manufacturer's line drawing of a

HY-2 cruise missile transporter with missile. The unique shape and configuration of the transporter shown in the manufacturer's photograph and line drawing is visible in the IDP. Particularly noteworthy are the four unique rib frameworks that support the protective canvas covering, which are depicted in the manufacturer's line drawing and are visible in the IDP. When the transporter arrives at the launch site, the protective canvas covering is removed for transfer of the missile to the launcher. The dimensions of the transporter provided in the manufacturer's line drawing, including the fifteen meter length, conform closely to the dimensions of the object determined by analyzing the IDP and associated information, thus confirming that what is shown in the IDP is in fact an HY-2 cruise missile transporter.

11. The HY-2 cruise missile launcher is shown in the manufacturer's photographs of a HY-2 cruise missile transporter loading a missile onto a launcher and of a HY-2 cruise missile launcher, and in a manufacturer's line drawing of an HY-2 cruise missile launcher (canvas removed), included in Exhibit 94. The unique shape and configuration of the launcher shown in the manufacturer's photographs and line drawings is visible in the IDP. Particularly noteworthy is the flat surface of the missile rails and the side extensions of the stabilizing jack housing that are shown in the manufacturer's photographs and line drawings and are also visible in the IDP. The dimensions of the launcher provided in the manufacturer's line drawing, with a length of 6.9 meters, conform closely to the dimensions of the object determined by analyzing the IDP and associated information, thus confirming that what is shown in the IDP is in fact an HY-2 cruise missile launcher.

12. Additionally, the specific positioning of the transporter with missile, transporter, and trucks towing launchers in Attachment D supports the conclusion that this is a HY-2 cruise missile staging area. In the case of the trucks towing missile launchers, two distinct objects—the truck and the missile launcher being towed—can be seen hitched to each other. Their alignment suggests they are ready for rapid deployment. Two missile transporters are also nearby, in a position to support the transfer of missiles to these launchers at the launch site. The proximity of the trucks towing launchers to missile transporters is consistent with such launch preparations. The HY-2 cruise missiles are transported separately from the launchers on the protective missile transporters, which can traverse rough terrain. During launch preparations when both launcher and transporter arrive at the launch site, the launcher is stabilized at the launch position and the missile transporter is backed up to the launcher. The transporter transfers the missile from its cradle rails to the launcher's rails.

Analysis of Attachment E

13. The IDP in Attachment E (Exhibit 94, Graphic 2) was also taken from a U.S. satellite on 16 October 1987, the same day as the attack on *Sea Isle City* and one day after the attack on *Sungari*. The area shown in Attachment E is less than one kilometer south of the area shown in Attachment D. The IDP in Attachment E shows four HY-2 cruise missile crates. These crates are identifiable from their unique shape, configuration, and dimensions.

14. As shown in the U.S. Navy photograph and depicted in the manufacturer's line drawing of the HY-2 cruise missile crate (included in Exhibit 94), these crates are rectangular in shape with a pointy pitched roof, and have a distinctive protrusion at one end for the missile nosecone. These characteristics are visible in the IDP: light can be seen reflecting off of the protrusion of the crate for the nosecone of the missile and the pointy pitched roof of the crate casts a triangular shadow on the ground. The dimensions of the crates provided in the manufacturer's line drawing -- in particular the length of 7.6 meters -- conform closely to the dimensions of the object determined by analyzing the IDP and associated information, thus confirming that what is shown in the IDP are in fact HY-2 cruise missile crates.

15. The IDPs in Attachment F (Exhibit 94, Graphic 3), Attachment G (Exhibit 94, Graphic 4), and Attachment H (Exhibit 94, Graphic 5) were taken from a U.S. satellite on 9 September 1987, just one month before the attacks on *Sungari* and *Sea Isle City*. The geographical coordinates of the area shown in Attachments F-H are the same as shown in Attachments D and E, with Attachment F approximately one kilometer northeast of Attachment D.

Analysis of Attachment F

16. The IDP in Attachment F shows a HY-2 cruise missile launcher. The analysis that supports this conclusion is the same as the analysis used for the IDP in Attachment D. The HY-2 cruise missile launcher is shown in manufacturer's photographs of a HY-2 cruise missile transporter loading a missile onto a launcher, and

of a HY-2 cruise missile launcher, and in a manufacturer's line drawing of an HY-2 cruise missile launcher (canvas removed), included in Exhibit 94. The unique shape and configuration of the launcher shown in the manufacturer's photographs and line drawings is shown in the IDP. Again, important distinctive characteristics include the flat surface of the missile rails and the side extensions of the stabilizing jack housing that are shown in the manufacturer's photographs and line drawings and are also visible in the IDP. The dimensions of the launcher provided in the manufacturer's line drawing, in particular the length of 6.9 meters, conform closely to the dimensions of the object determined by analyzing the IDP and associated information, thus confirming that what is shown in the IDP is in fact a HY-2 cruise missile launcher.

Analysis of Attachment G

17. The IDP in Attachment G shows two HY-2 cruise missile launchers and two HY-2 cruise missile transporters. Again, the analysis that supports this identification is the same as the analysis used for the IDP in Attachment D. The transporter is shown in a manufacturer's photograph of a HY-2 cruise missile transporter loading a missile onto a launcher and in a manufacturer's line drawing of an HY-2 cruise missile transporter with missile, included in Exhibit 94. The unique shape and configuration of the transporter shown in the manufacturer's photograph and line drawing is shown in the IDP. The four unique rib frameworks that support the protective canvas covering, which are depicted in the manufacturer's line drawing, are also discernable in the IDP. The dimensions of the transporter provided in the manufacturer's line drawing, in particular the length of 15 meters, conform closely to the dimensions of the object determined by analyzing the IDP

and associated information, thus confirming that what is shown in the IDP is in fact a HY-2 cruise missile transporter.

18. The HY-2 cruise missile launcher is shown in manufacturer's photographs of a HY-2 cruise missile transporter loading a missile onto a launcher and of a HY-2 cruise missile launcher, and in a manufacturer's line drawing of an HY-2 cruise missile launcher (canvas removed), included in Exhibit 94. The unique shape and configuration of the launcher shown in the manufacturer's photographs and line drawings is shown in the IDP. The flat surface of the missile rails and the side extensions of the stabilizing jack housing that are shown in the manufacturer's photographs and line drawings are also visible in the IDP. The dimensions of the launcher provided in the manufacturer's line drawing, in particular the length of 6.9 meters, conform closely to the dimensions of the object determined by analyzing the IDP and associated information, thus confirming that what is shown in the IDP is in fact an HY-2 cruise missile launcher.

19. The IDP in Attachment H shows two HY-2 cruise missile crates. As with the crates shown in Attachment D, the crates in Attachment H are identifiable because of their unique shape, configuration, and dimensions. As shown in the U.S. Navy photograph and depicted in the manufacturer's line drawing of the HY-2 cruise missile crate (included in Exhibit 94), these crates are rectangular in shape with a pointy pitched roof, and have a distinctive protrusion at one end for the missile nosecone. These features are discernable in the IDP. The dimensions of the crates provided in the manufacturer's line drawing, in particular the length of 7.6 meters, conform closely to the

dimensions of the object determined by analyzing the IDP and associated information, thus confirming that what is shown in the IDP are in fact HY-2 cruise missile crates.

Analysis of Attachments I, J and K

20. Attachment I (Exhibit 208, Image 1) and Attachment J (Exhibit 208, Image 2) show the area generally known as Al Faw, and provide the overall geographical context for the IDPs that follow. As indicated on these images, the succeeding IDPs focus on smaller areas described in the inset boxes.

21. The IDPs in Attachment K (Exhibit 208, Image 3) and Attachment L (Exhibit 208, Image 4) were taken from a U.S. satellite on 5 September 1987, one month prior to the attacks on *Sungari* and *Sea Isle City*. Attachment M (Exhibit 208, Image 5) was taken on 16 October 1987, the day of the attack on *Sea Isle City* and one day after the attack on *Sungari*. All three images show HY-2 Site 3. The geographical coordinates for HY-2 Site 3 are 295550N/0482640E. As indicated on Attachment K, the boxed annotations labeled Graphic 2 and Graphic 3 indicate the areas shown in Attachment L and Attachment M.

Analysis of Attachment L

22. Attachment L shows standard permanent HY-2 cruise missile launch positions as well as one truck on an access road. The launch positions are characterized by their concrete surfaces and distinct "keyhole" shape. The circular part of the keyhole is the missile launcher position, and the straight section of the keyhole, which is the adjoining

apron, is used for the missile transporter to align and back up to the launcher. This apron also serves as a general directional reference point for use in aiming the missile, though missiles may be fired in various directions from such sites. The standard concrete HY-2 cruise missile keyhole launch pad has been used at permanently fixed HY-2 launch sites by Iraq, Iran, and other countries to facilitate rapid and efficient missile firings. Temporary HY-2 cruise missile launch sites, for example the Nahr-e Owyeh site used by Iran (addressed subsequently), do not use the concrete pads, but have been prepared and pre-surveyed for similar rapid and efficient missile firings.

23. The presence of the truck on the access road shown in Attachment L indicates that the road was capable of supporting vehicle traffic and permitting access to the launch site as of 5 September1987, the date on which the image was taken.

Analysis of Attachment M

24. The IDP in Attachment M shows two standard HY-2 cruise missile launch sites, identifiable by their distinctive keyhole shapes. The IDP also shows an access road leading to the launch sites with support trucks traveling on the road. The support trucks are identifiable by their distinctive cabs and cargo beds. Again, the presence of support trucks on the access road indicates that the road was in operation on 16 October 1987 and capable of supporting large vehicle traffic. The smooth surface of the concrete keyhole launch positions and dirt access roads indicate that HY-2 Site 3 was then capable of cruise missile operations.

Analysis of Attachments N and O

25. The IDPs in Attachment N (Exhibit 208, Image 6) and Attachment O (Exhibit 208, Image 7 show the site known as the Nahr-e Owyeh launch site. The IDP in Attachment N was taken from a U.S. satellite on 16 October 1987, the day of the attack on *Sea Isle* City and one day after the attack on *Sungari*. The geographical coordinates of the overview area shown in Attachment N are 295613N/0483738E. The IDP in Attachment O is an enlargement or magnification of the Nahr-e Owyeh launch site, also taken on 16 October 1987. The geographical coordinates of the area depicted in Attachment O are the same as Attachment N. The IDP in Attachment O shows two HY-2 launch positions and support tents. The support tents are set up in pairs and are recognizable by their canvas covering and pitched roofs. These tents are in a position to support launching HY-2 cruise missiles, for example, by housing the necessary electronics equipment.

Analysis of Attachment P

26. The IDP in Attachment P (Exhibit 208, Image 8) also shows the Nahr-e Owyeh launch site, but it was taken by a U.S. satellite on 14 December 1987, approximately two months after the attacks on *Sungari* and *Sea Isle City*. The geographical coordinates of the area shown in Attachment P are the same as in Attachments N and O. Like the IDP in Attachment O, the IDP in Attachment P shows the two HY-2 launch positions of the Nahr-e Owyeh launch site along with support tents. Attachment P also shows a HY-2 missile on a missile launcher ready to be fired from Launch Position 1. The missile and launcher are identifiable by their dimensions and size, and placement at the center of the

launch position. The pointed nose of the missile is aimed toward the water, the missile's wings slightly flare out at the rear of the missile, and the high vertical stabilizer or tail of the missile can be seen in the shadow of the missile on the ground.

27. The Nahr-e Owyeh launch site is recognizable as one of Iran's temporary HY-2 cruise missile launch sites. These unique temporary launch sites do not contain the standard HY-2 cruise missile permanent concrete keyhole pads. The positions are round in shape with a treated surface (as seen in the darker area around the circular launch site in Attachment P over graded earth), and have adjoining straight road approaches or aprons to align the missile transporter and launcher. Also noteworthy are the perimeter earthen berms used to protect the launch site from adjacent marsh. In addition to the HY-2 cruise missile transporter and launcher, support tents are also present on Iran's temporary HY-2 cruise missile launch sites, as can be seen in Attachments O and P.

28. The run-up apron (approach road to the circular pad) at Launch Positions 1 and 2 serves as a general directional reference for use in aiming missiles from these sites. Given the location of the Nahr-e Owyeh launch sites it is possible to identify the directions indicated by their respective run-up aprons. The run-up apron of Launch Position 1 points in the direction of Bubiyan Island between the sea approaches to northern Kuwait and Umm Qasr in Iraq. The missile on the launcher visible on the circular launch pad at Launch Position 1 in Attachment P is, in fact, pointed in the direction of Bubiyan Island. The run-up apron of Launch Position 2 points in the direction of the al-Ahmadi Sea

Island terminal. These paths are depicted in U.S. Exhibit 210, a copy of which is attached to this report.

Analysis of Attachments Q, R, S, T, and U

29. The IDPs in Attachment Q (Exhibit 208, Image 9), Attachment R (Exhibit 208, Image 10), Attachment S (Exhibit 208, Image 11), Attachment T (Exhibit 208, Image 12), and Attachment U (Exhibit 208, Image 13) refute Iran's contention that Iraq had control of a missile site in Al Faw area at geographical coordinates 300012N-481705E at the time of the attacks on *Sungari* and *Sea Isle City*. The IDPs in Attachments Q-T demonstrate that no missile site existed at the time of the attacks on *Sungari* and *Sea Isle City* anywhere in the vicinity of the location specified by Iran. However, the IDP in Attachment U demonstrates that a missile site was later built near the position specified by Iran at geographical coordinates 295806N-0481955E.

30. The IDP in Attachment Q was taken from a U.S. satellite on 13 November 1987, approximately one month after the attacks on *Sungari* and *Sea Isle City*. The location of the area shown in Attachment Q is near Al Faw Salt Factory. The IDP in Attachment Q shows two existing former Iraqi HY-2 launch sites, HY-2 Site 1 and HY-2 Site 2. The Line of Contact, depicting the military-built earthen berm separating the Iraqi forces from the Iranian-controlled Al Faw peninsula, is also evident. However, at the location of the Iraqi HY-2 site alleged to exist by Iran there is no indication of a missile site.

31. Similar to the IDP in Attachment Q, the IDP in Attachment R shows HY-2 Site 1, but in greater detail. The IDP in Attachment R is a magnification of Attachment Q. The geographical coordinates of the area shown in Attachment R are near 295800N/0482100E. Again, in the location of the site alleged to exist by Iran, there is no indication of a missile site.

32. The IDP in Attachment S was also taken from a U.S. satellite on 13 November 1987. The geographical coordinates of the area shown in Attachment S are 295813N/0482149E. The IDP in Attachment S shows HY-2 Site 2 with four HY-2 launch positions, and is provided to confirm the location of this site and its location in relation to the other sites.

33. The IDP in Attachment T is another magnification from Attachment Q. The geographical coordinates of the area shown in Attachment T are near 300012N/0481705E. The IDP in Attachment T is well-focused on the location of the site alleged to exist by Iran. Once again, there is no indication of the existence of a missile launch site in this Iraqi-controlled area behind the Line of Contact berm, even one month after the attacks in October 1987.

34. Attachment U was taken from a U.S. U-2 aircraft on 15 October 1994 and reveals the presence of a HY-2 cruise missile launch site built earlier. Other information indicates that this site was built in April 1989. This site built in 1989 is within the geographical coordinates shown in Attachment U and in Attachment T, and this site is

reasonably close to the geographical coordinates specified by Iran. This image shows in some detail the site built in 1989 and, for comparison, the HY-2 Site 1 that existed in 1987. The 1989 HY-2 site, established after the Iraqis regained control of Al Faw, was probably built at a greater and safer distance from the range of Iranian artillery. The United Nations Iraq and Kuwait Observation Mission (UNIKOM) was later established at the 1989 HY-2 site to monitor the ten mile (approximate) exclusion zone near the border area between Iraq and Kuwait after the Desert Storm War with Iraq in 1991.

Conclusion

35. In conclusion, the foregoing analysis of the IDPs submitted by the United States demonstrates conclusively that: (1) Iran controlled the territory in Al Faw area that contained operational HY-2 cruise missile launch sites capable of launching the missiles that hit *Sungari* on 15 October 1987 and *Sea Isle City* on 16 October 1987, complete with missile transporters, launchers, tow trucks, missile crates, and missiles; and (2) no missile site existed at the time of the attacks on *Sungari* and *Sea Isle City* anywhere in the vicinity of the Iraqi-held location specified by Iran.

36. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: 16 NOV 2002

Deborah Martin

Deborah Martin

LIST OF ATTACHMENTS

Attachment A – Exhibit 94, Al Faw Area

Attachment B – Exhibit 94, Al Faw Area, Map Inset 1

Attachment C – Exhibit 94, Map Inset 2

Attachment D – Exhibit 94, Graphic 1

Attachment E – Exhibit 94, Graphic 2

Attachment F – Exhibit 94, Graphic 3

Attachment G – Exhibit 94, Graphic 4

Attachment H – Exhibit 94, Graphic 5

Attachment I – Exhibit 208, Image 1

Attachment J – Exhibit 208, Image 2

Attachment K – Exhibit 208, Image 3

Attachment L – Exhibit 208, Image 4

Attachment M – Exhibit 208, Image 5

Attachment N – Exhibit 208, Image 6

Attachment O – Exhibit 208, Image 7

Attachment P – Exhibit 208, Image 8

Attachment Q – Exhibit 208, Image 9

Attachment R – Exhibit 208, Image 10

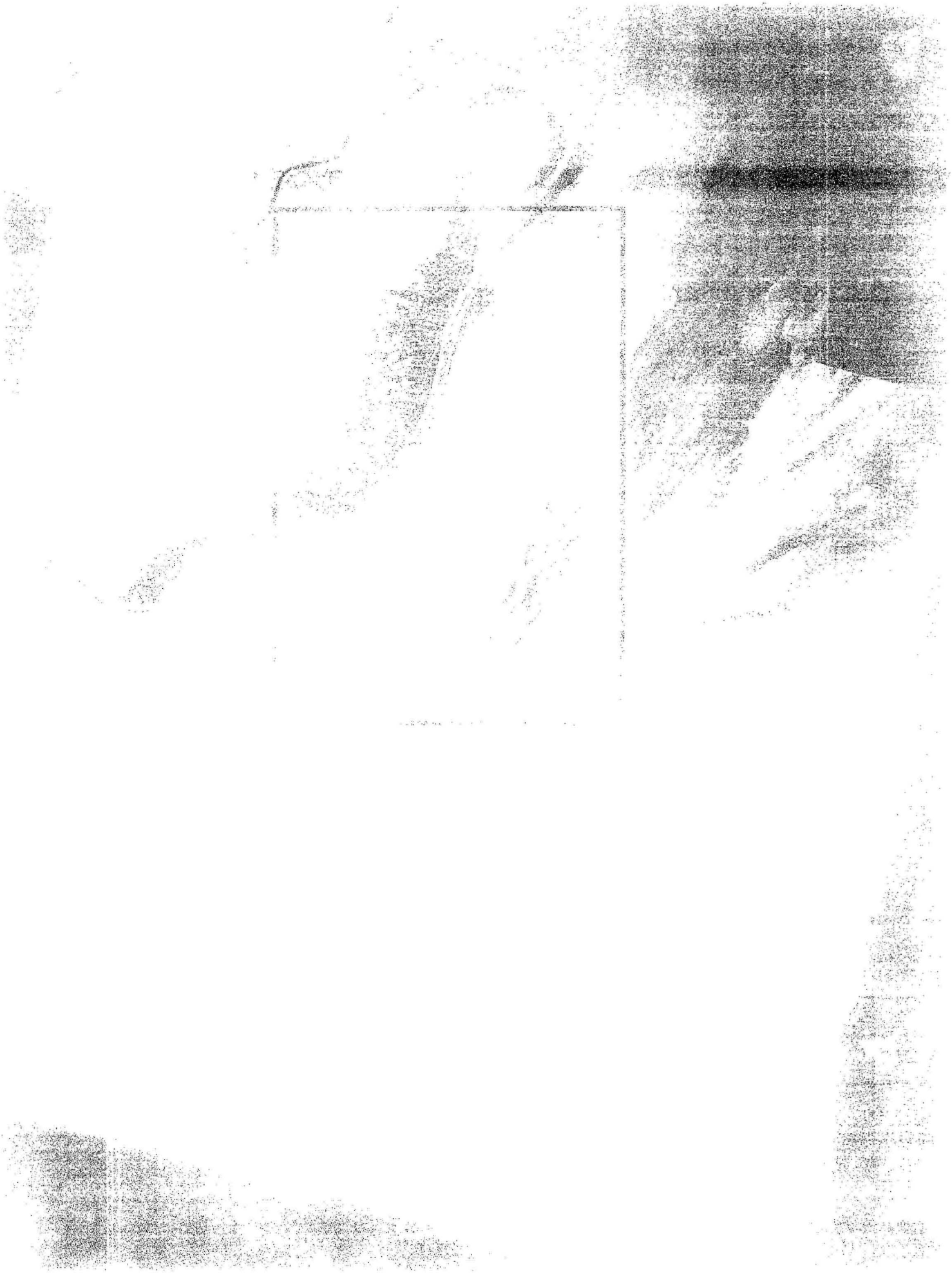
Attachment S – Exhibit 208, Image 11

Attachment T – Exhibit 208, Image 12

Attachment U – Exhibit 208, Image 13

Reference Map from U.S. Exhibit 210

ATTACHMENT A – EXHIBIT 94, AL FAW AREA



ATTACHMENT B – EXHIBIT 94, AL FAW AREA, MAP INSET 1


Al Faw Area Map Inset 1
Shatt Al Arab
See map inset 2

ATTACHMENT C – EXHIBIT 94, MAP INSET 2

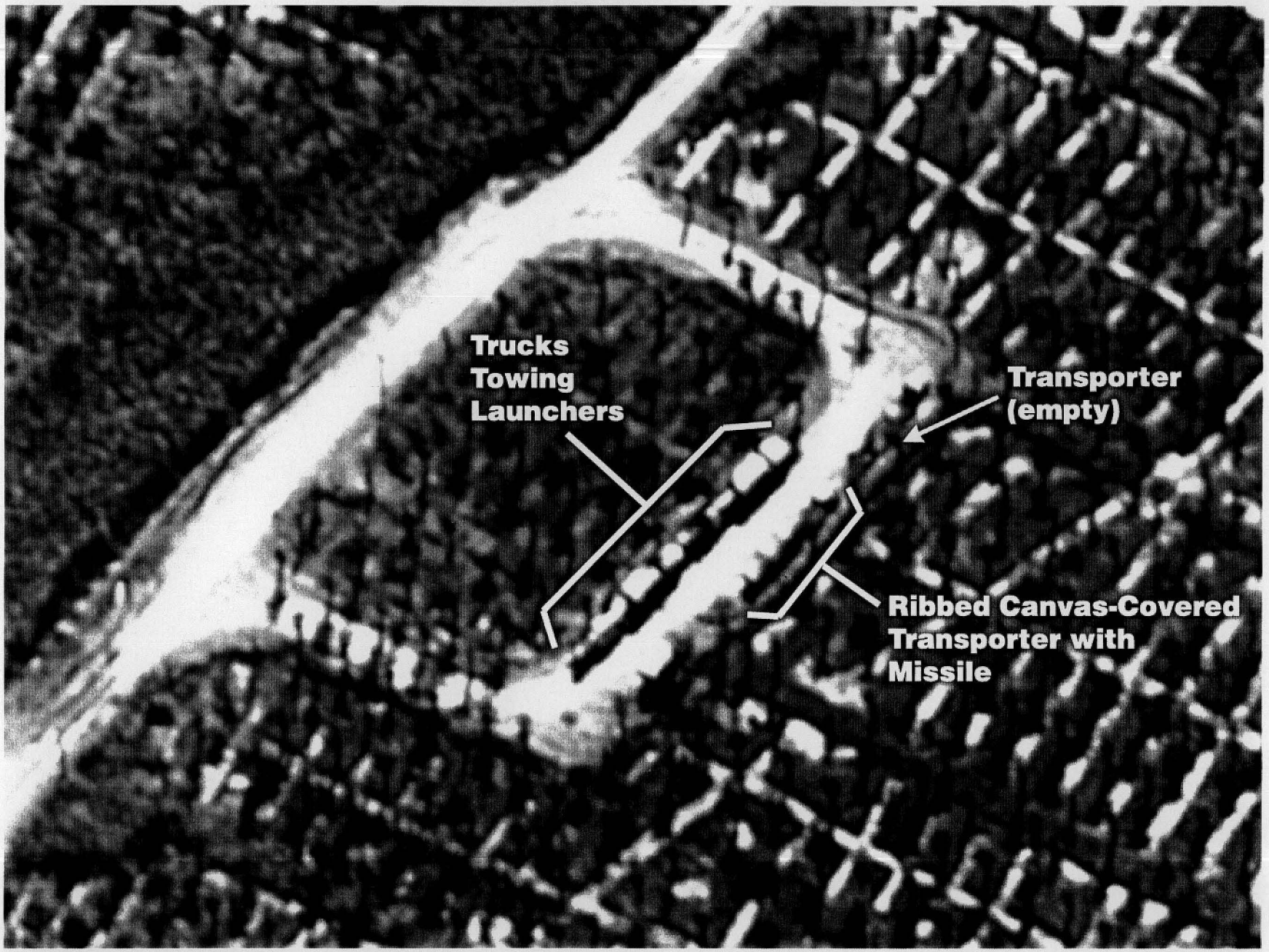
ATTACHMENT D – EXHIBIT 94, GRAPHIC 1

U.S. Satellite Imagery Product
HY-2 Cruise Missile Vehicles
Al Faw Area, Iran
16 October 1987

HY-2 Cruise Missile Vehicles

Al Faw Area, Iran

16 October 1987



Graphic 1

ATTACHMENT E – EXHIBIT 94, GRAPHIC 2

U.S. Satellite Imagery Products
HY-2 Cruise Missile Crates
Al Faw Area, Iran
16 October 1987

HY-2 Cruise Missile Crates

Al Faw Area, Iran

16 October 1987

Graphic 2

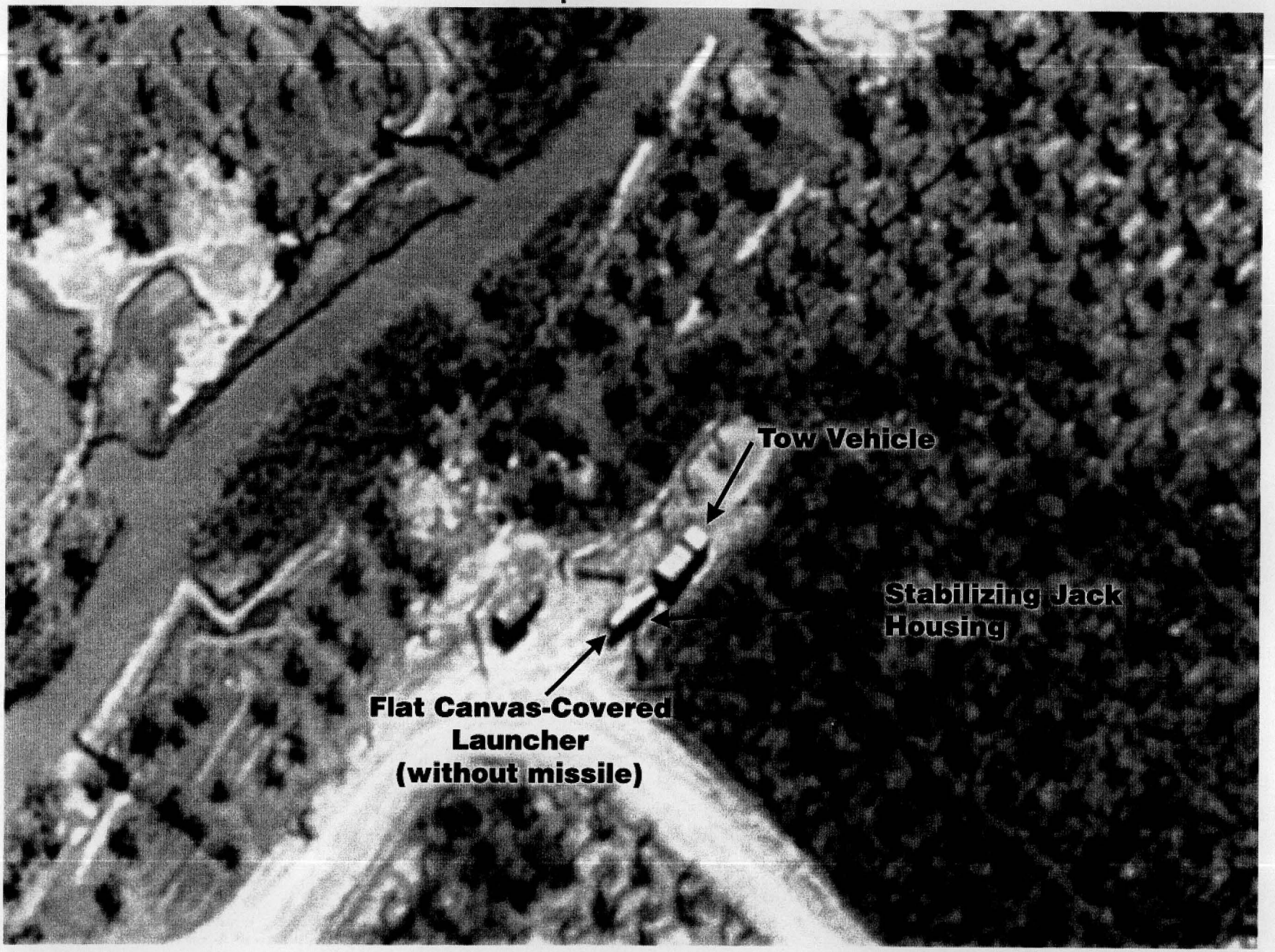
ATTACHMENT F – EXHIBIT 94, GRAPHIC 3

U.S. Satellite Imagery Product
HY-2 Cruise Missile Vehicles
Al Faw Area, Iran
9 September 1987

HY-2 Cruise Missile Vehicles

Al Faw Area, Iran

9 September 1987



Graphic 3

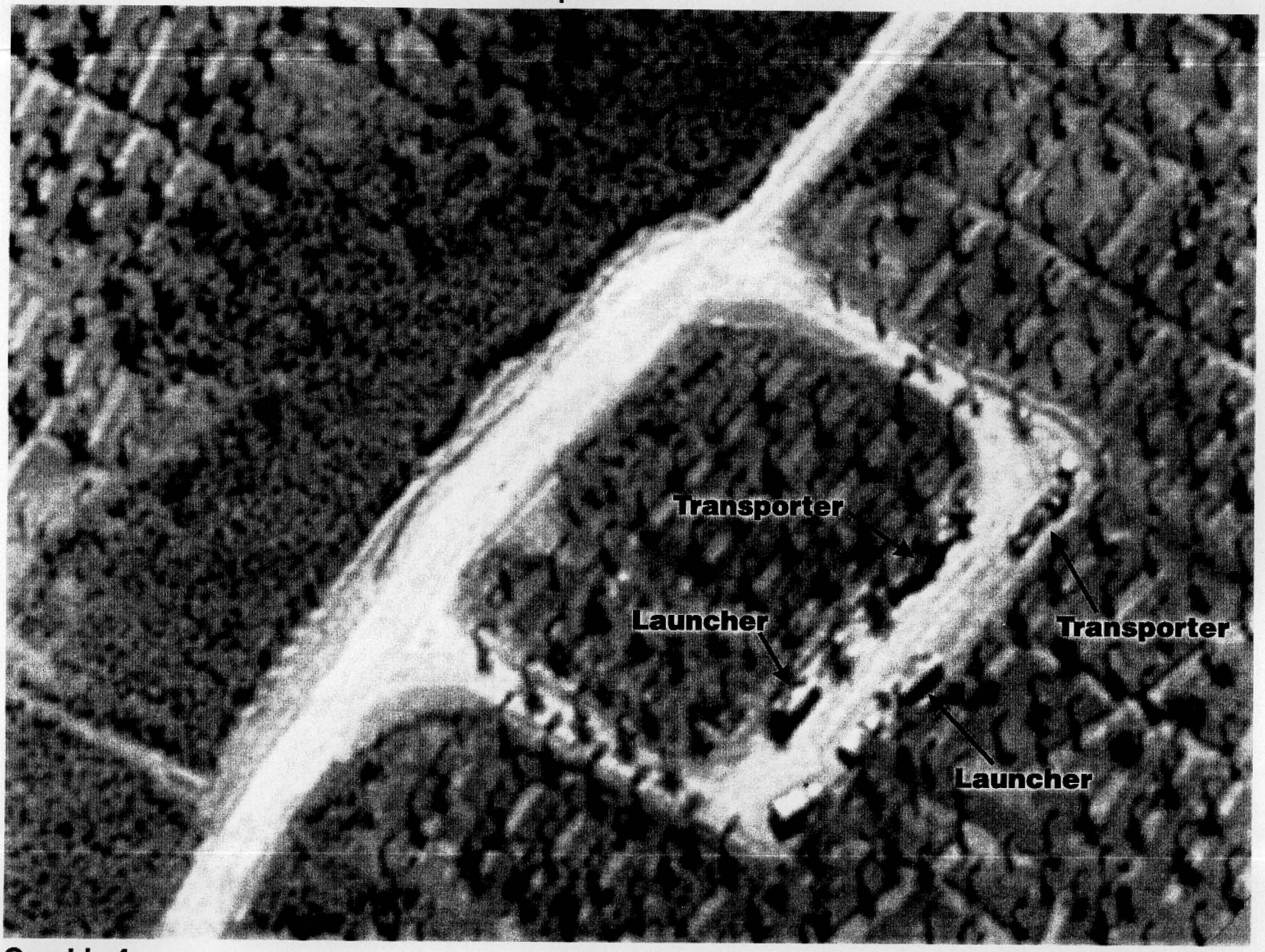
ATTACHMENT G – EXHIBIT 94, GRAPHIC 4

U.S. Satellite Imagery Product
HY-2 Cruise Missile Vehicles
Al Faw Area, Iran
9 September 1987

HY-2 Cruise Missile Vehicles

Al Faw Area, Iran

9 September 1987



Graphic 4

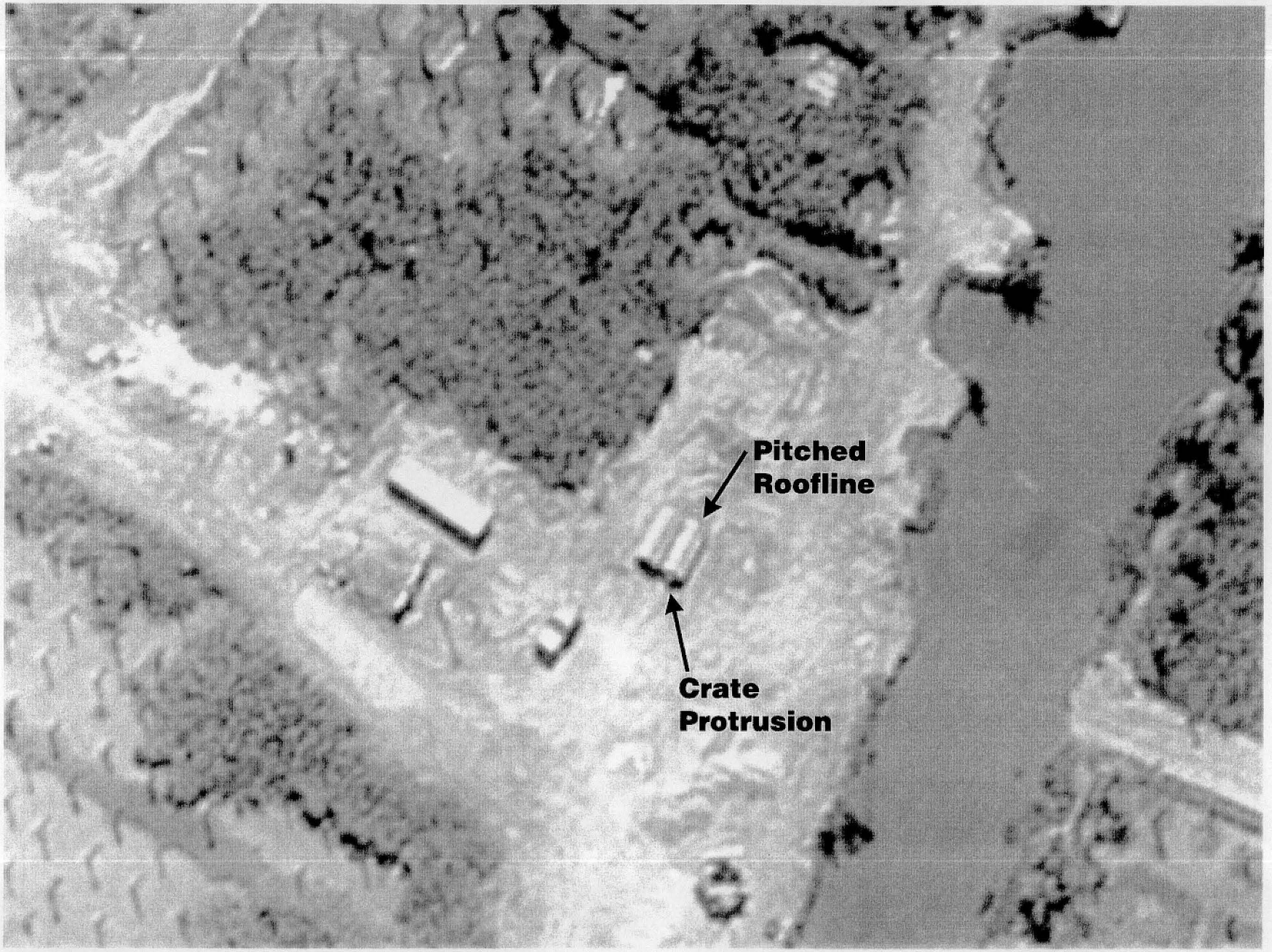
ATTACHMENT H – EXHIBIT 94, GRAPHIC 5

U.S. Satellite Imagery Product
HY-2 Cruise Missile Vehicles
Al Faw Area, Iran
9 September 1987

HY-2 Cruise Missile Crates

Al Faw Area, Iran

9 September 1987



Graphic 5

ATTACHMENT I – EXHIBIT 208, IMAGE 1

Al Faw Area

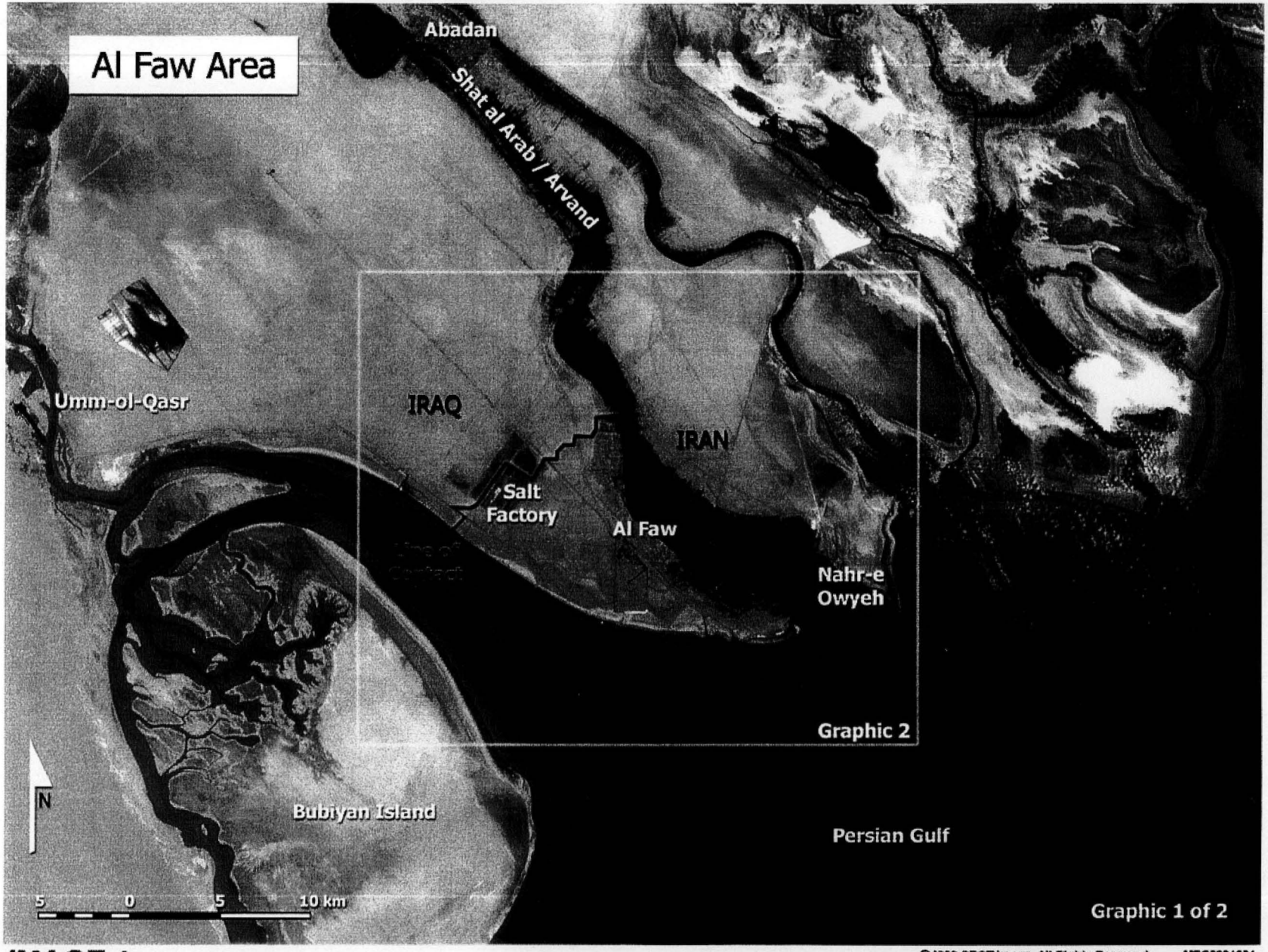


IMAGE 1

MDS0301001

ATTACHMENT J – EXHIBIT 208, IMAGE 2

Al Faw Area

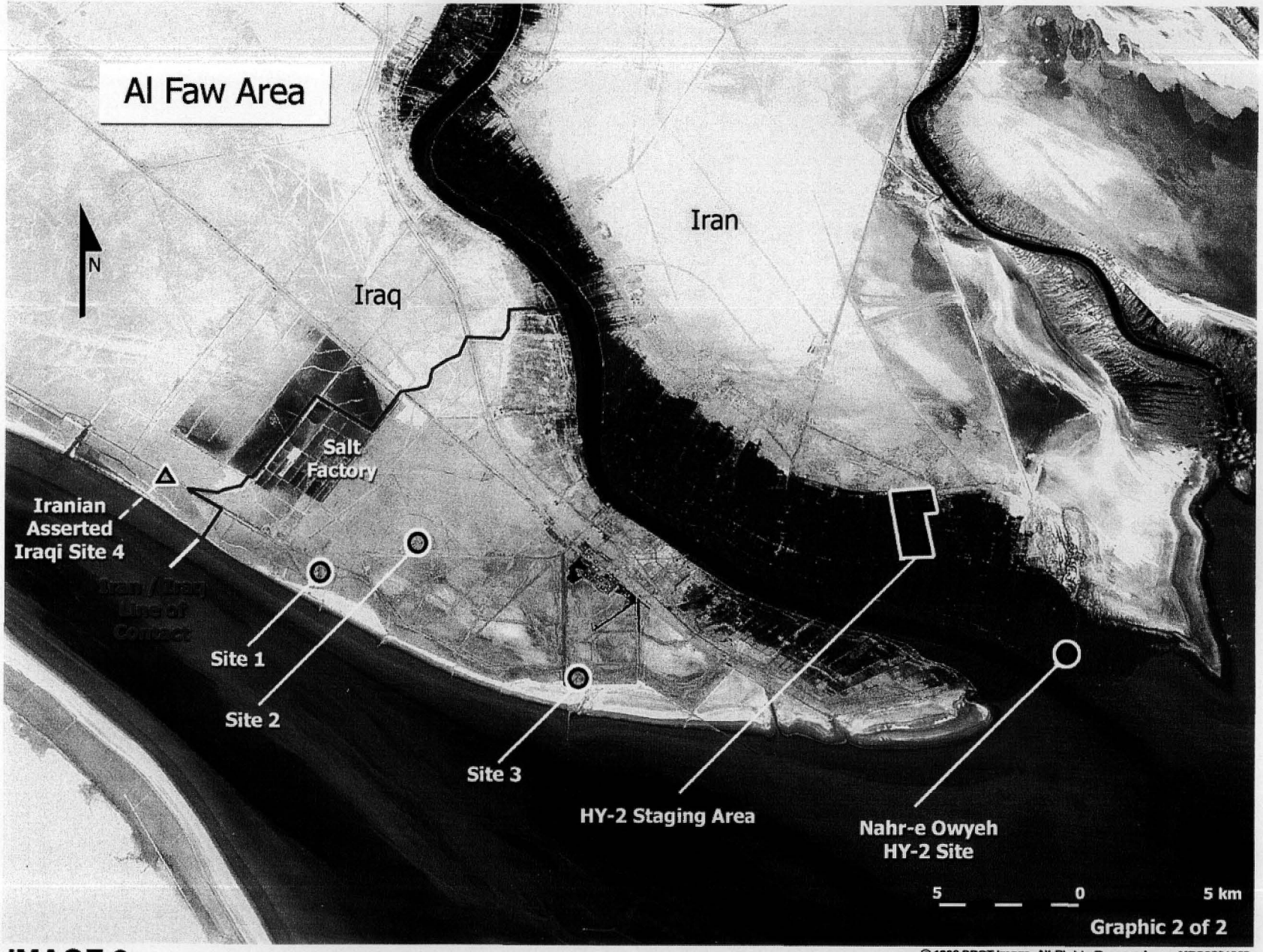


IMAGE 2

MDS0301002

ATTACHMENT K – EXHIBIT 208, IMAGE 3

HY-2 Site 3
Al Faw Area, Iraq
5 September 1987

HY-2 Missile Launching Site 3

HY-2 Site 3

Al Faw Area, Iraq

5 September 1987

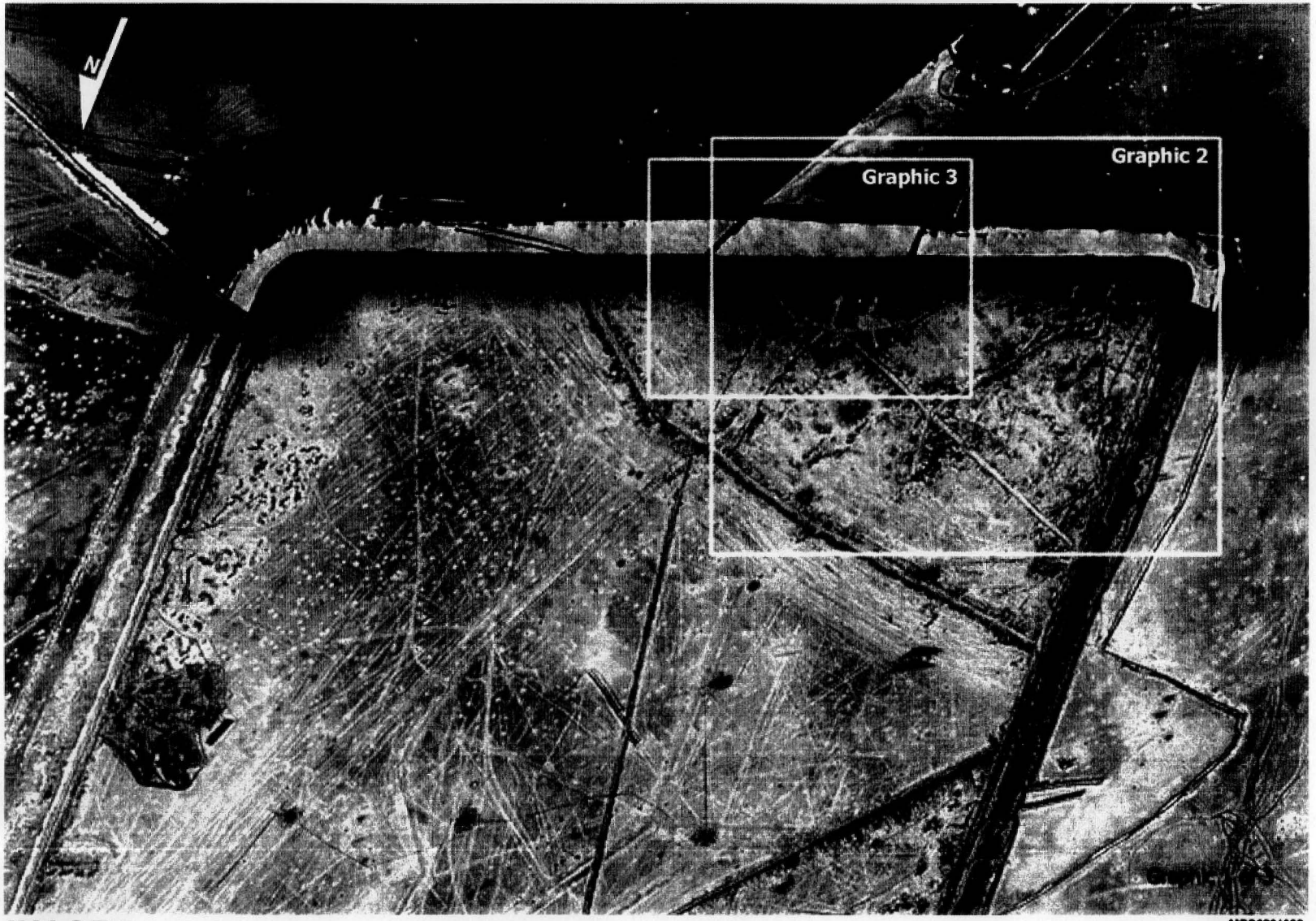


IMAGE 3

MDS0301003

ATTACHMENT L – EXHIBIT 208, IMAGE 4

HY-2 Site 3
Al Faw Area, Iraq
5 September 1987

HY-2 Missile Launching Site 3

HY-2 Site 3

Al Faw Area, Iraq

5 September 1987

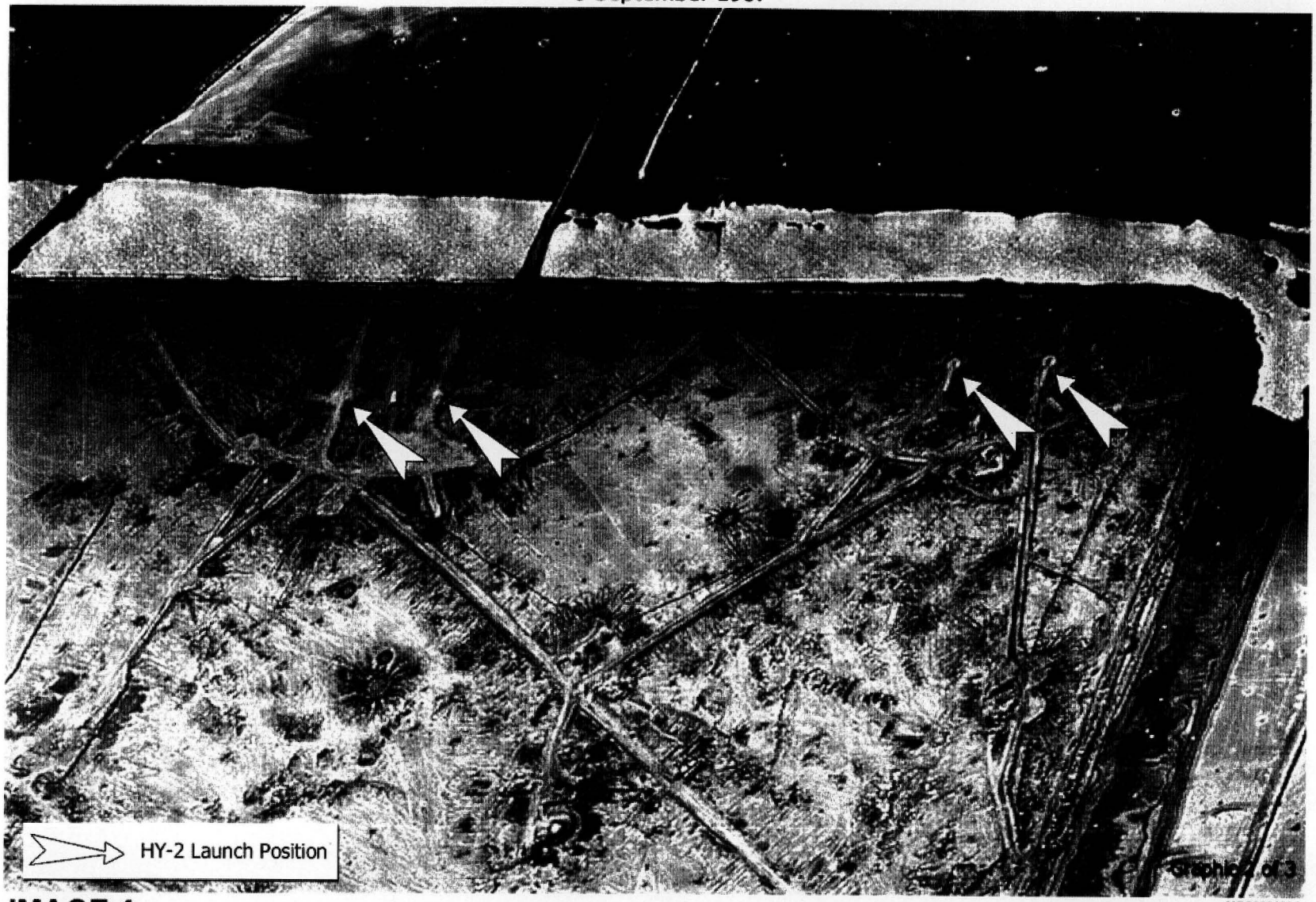


IMAGE 4

MDS0301004

ATTACHMENT M – EXHIBIT 208, IMAGE 5

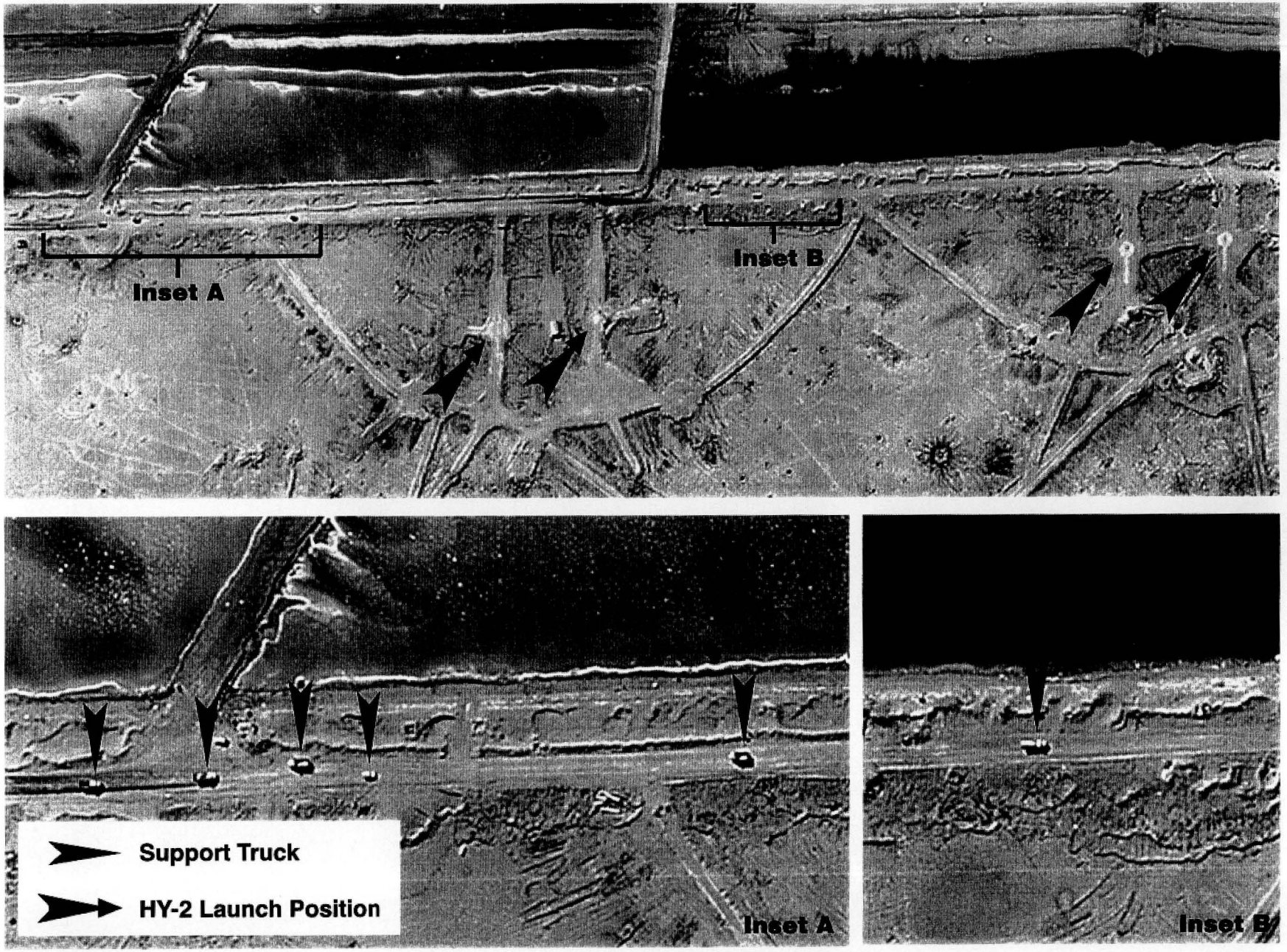
HY-2 Site 3
Al Faw Area, Iraq
16 October 1987

HY-2 Missile Launching Site 3

HY-2 Site 3

Al Faw Area, Iraq

16 October 1987



Graphic 8

ATTACHMENT N – EXHIBIT 208, IMAGE 6

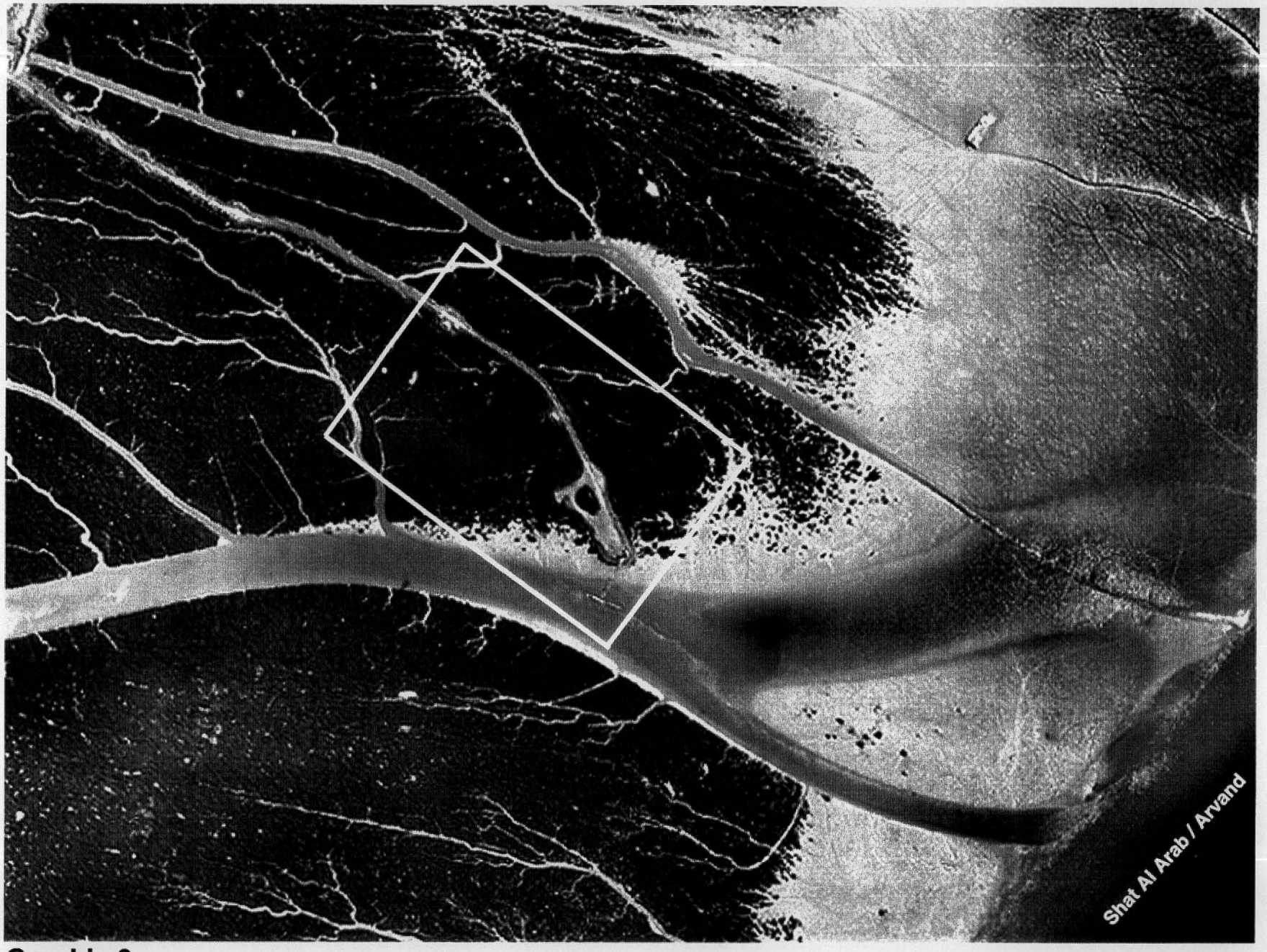
Nahr-e Owyeh Launch Site
Al Faw Area, Iran
16 October 1987

HY-2 Missile Launching Site at Nahr-e Owyeh

Nahr-e Owyeh Launch Site

Al Faw Area, Iran

16 October 1987



Graphic 6

ATTACHMENT O – EXHIBIT 208, IMAGE 7

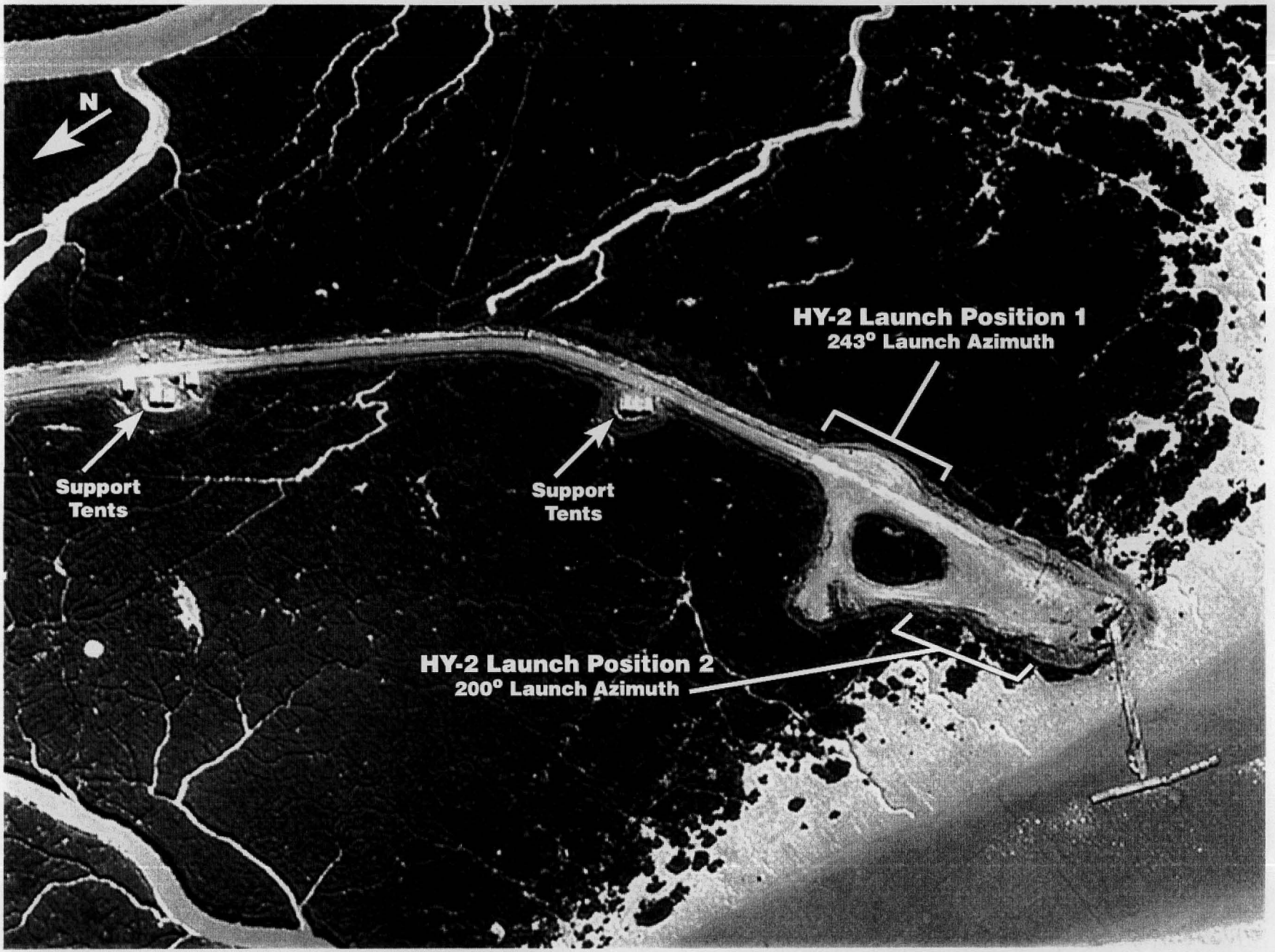
Nahr-e Owyeh Launch Site
Al Faw Area, Iran
16 October 1987

HY-2 Missile Launching Site at Nahr-e Owyeh

Nahr-e Owyeh Launch Site

Al Faw Area, Iran

16 October 1987



Graphic 7

ATTACHMENT P – EXHIBIT 208, IMAGE 8

Nahr-e Owyeh Launch Site
Al Faw Area, Iran
14 December 1987

HY-2 Missile Launching Site at Nahr-e Owyeh

Nahr-e Owyeh Launch Site

Al Faw Area, Iran

14 December 1987

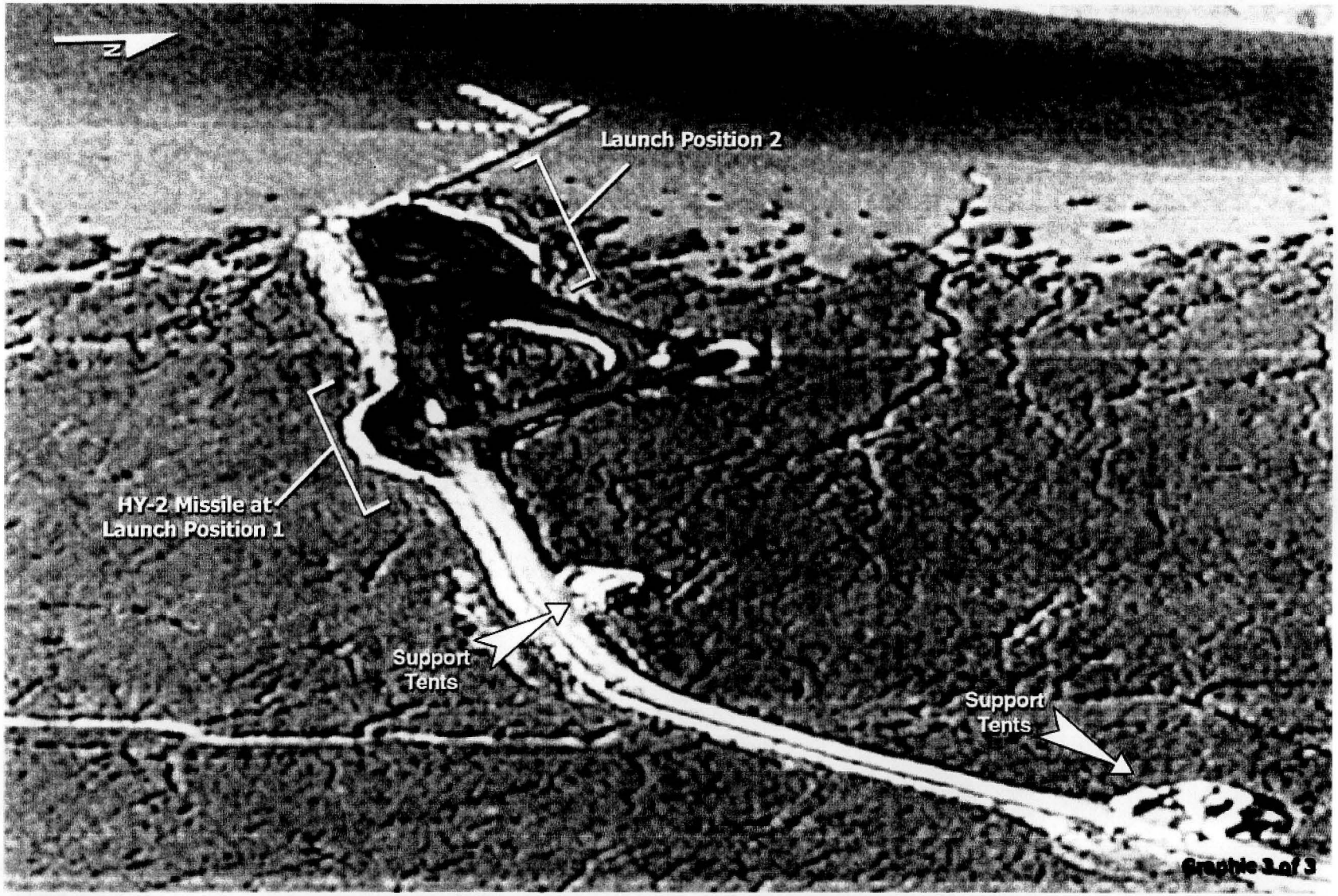


IMAGE 8

MDS0701008

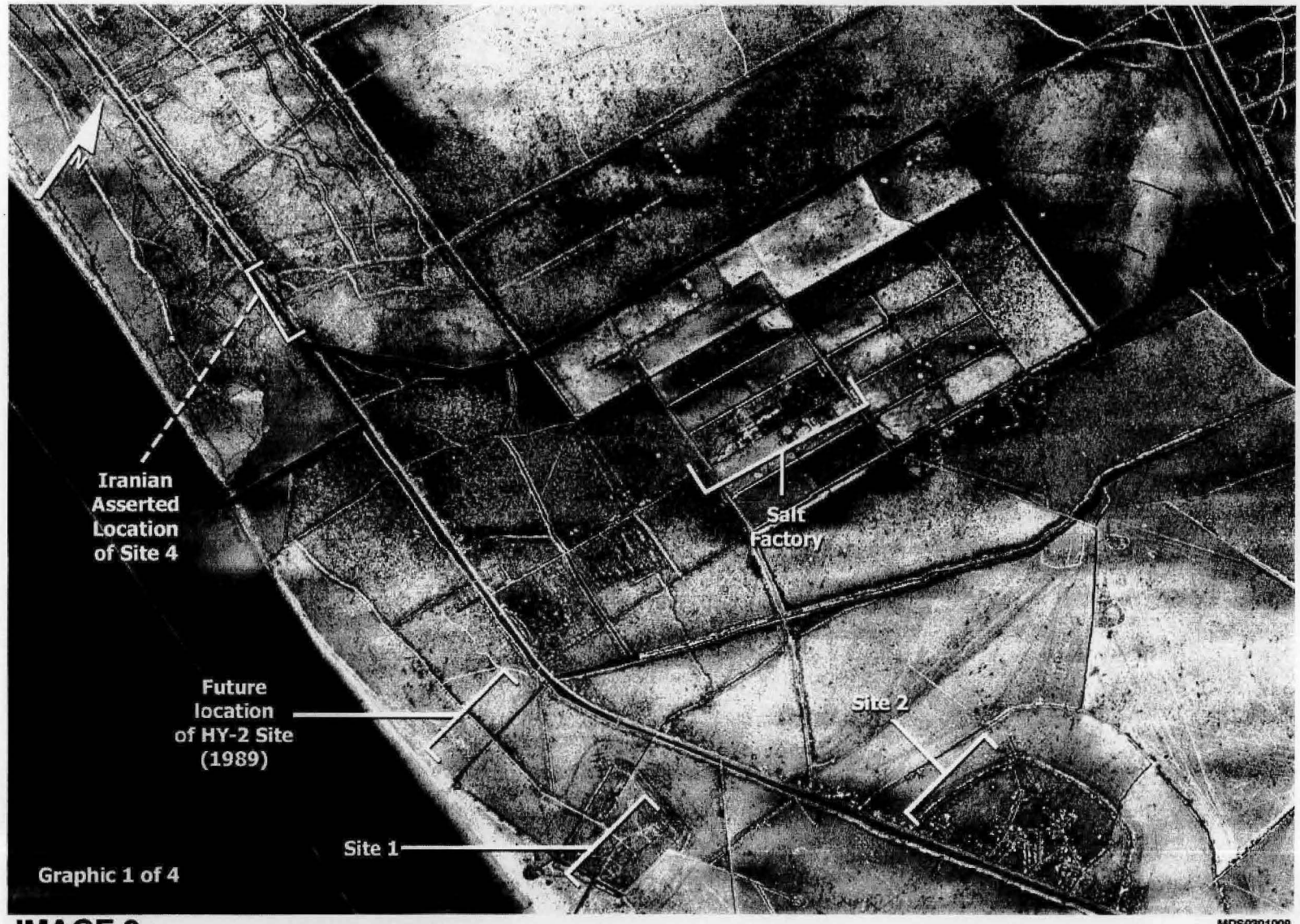
ATTACHMENT Q – EXHIBIT 208, IMAGE 9

HY-2 Sites
Al Faw Area
13 November 1987

HY-2 Sites

Al Faw Area

13 November 1987



MD50301009

IMAGE 9

ATTACHMENT R – EXHIBIT 208, IMAGE 10

HY-2 Site 1
Al Faw Area, Iraq
13 November 1987

HY-2 Missile Launching Site 1

HY-2 Site 1

Al Faw Area, Iraq

13 November 1987

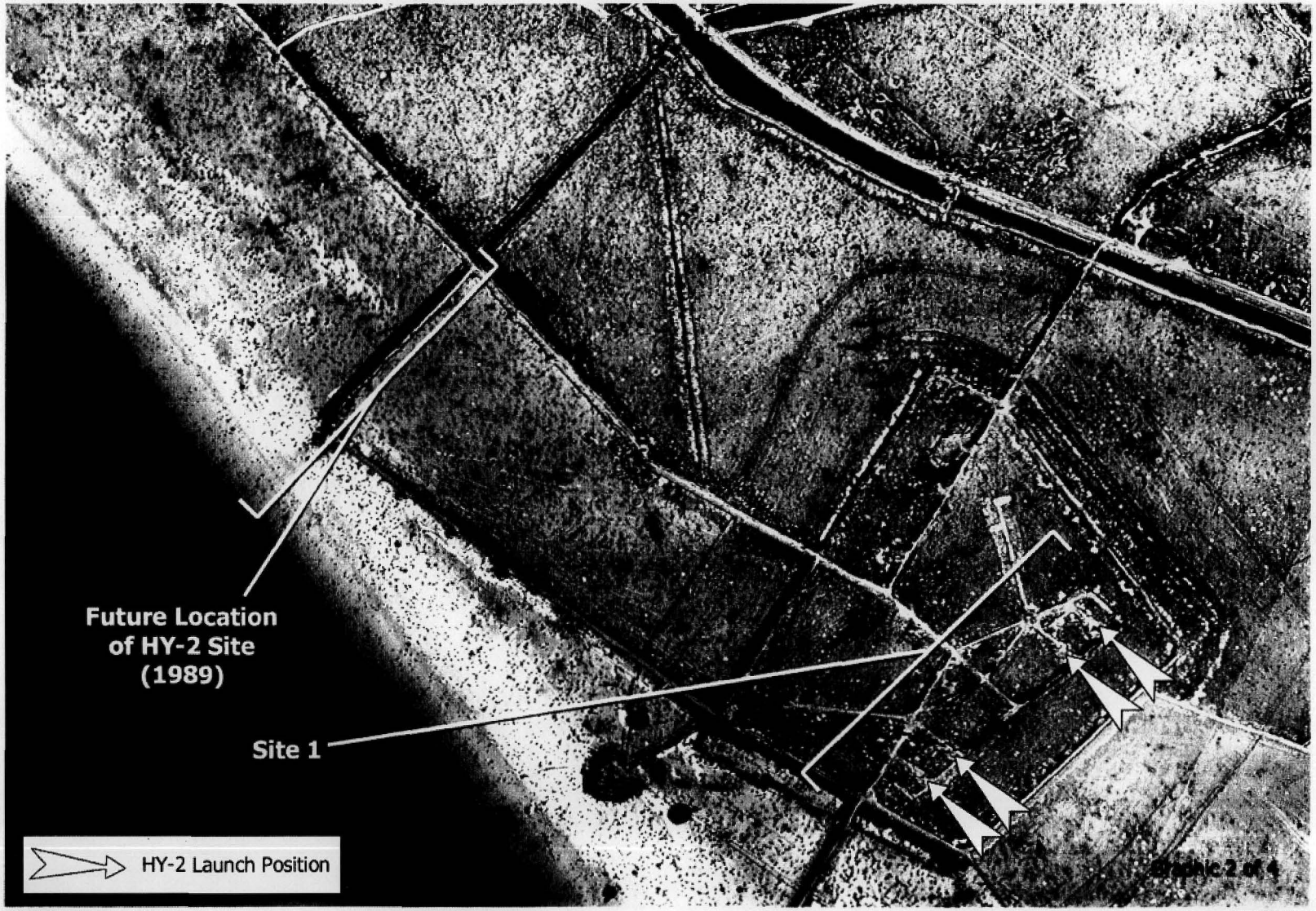


IMAGE 10

MDS0301010

ATTACHMENT S – EXHIBIT 208, IMAGE 11

HY-2 Site 2
Al Faw Area, Iraq
13 November 1987

HY-2 Missile Launching Site 2

HY-2 Site 2

Al Faw Area, Iraq

13 November 1987

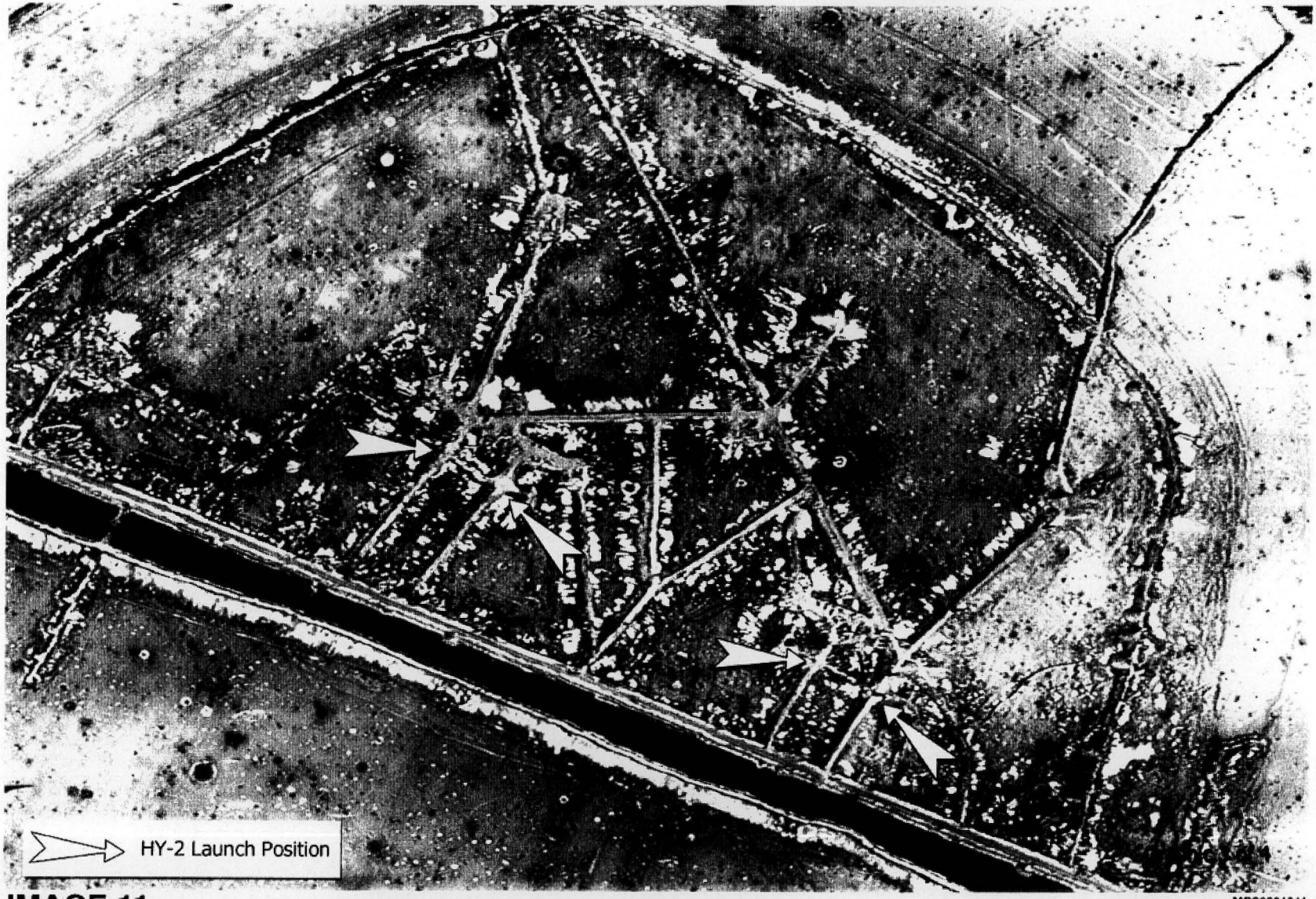


IMAGE 11

MDS0301011

ATTACHMENT T – EXHIBIT 208, IMAGE 12

Iranian Asserted Location of Site 4
Al Faw Area, Iraq
13 November 1987

Location of Iranian Asserted HY-2 Missile Launching Site 4

Iranian Asserted Location of Site 4

Al Faw Area, Iraq

13 November 1987

IMAGE 12

MDS0301012

ATTACHMENT U – EXHIBIT 208, IMAGE 13

HY-2 Sites
Al Faw Area, Iraq
15 October 1994

Missile Launching Site Built in 1989 in Vicinity of Location of Iranian Asserted HY-2 Missile Launching Site 4

HY-2 Sites

Al Faw Area, Iraq

15 October 1994

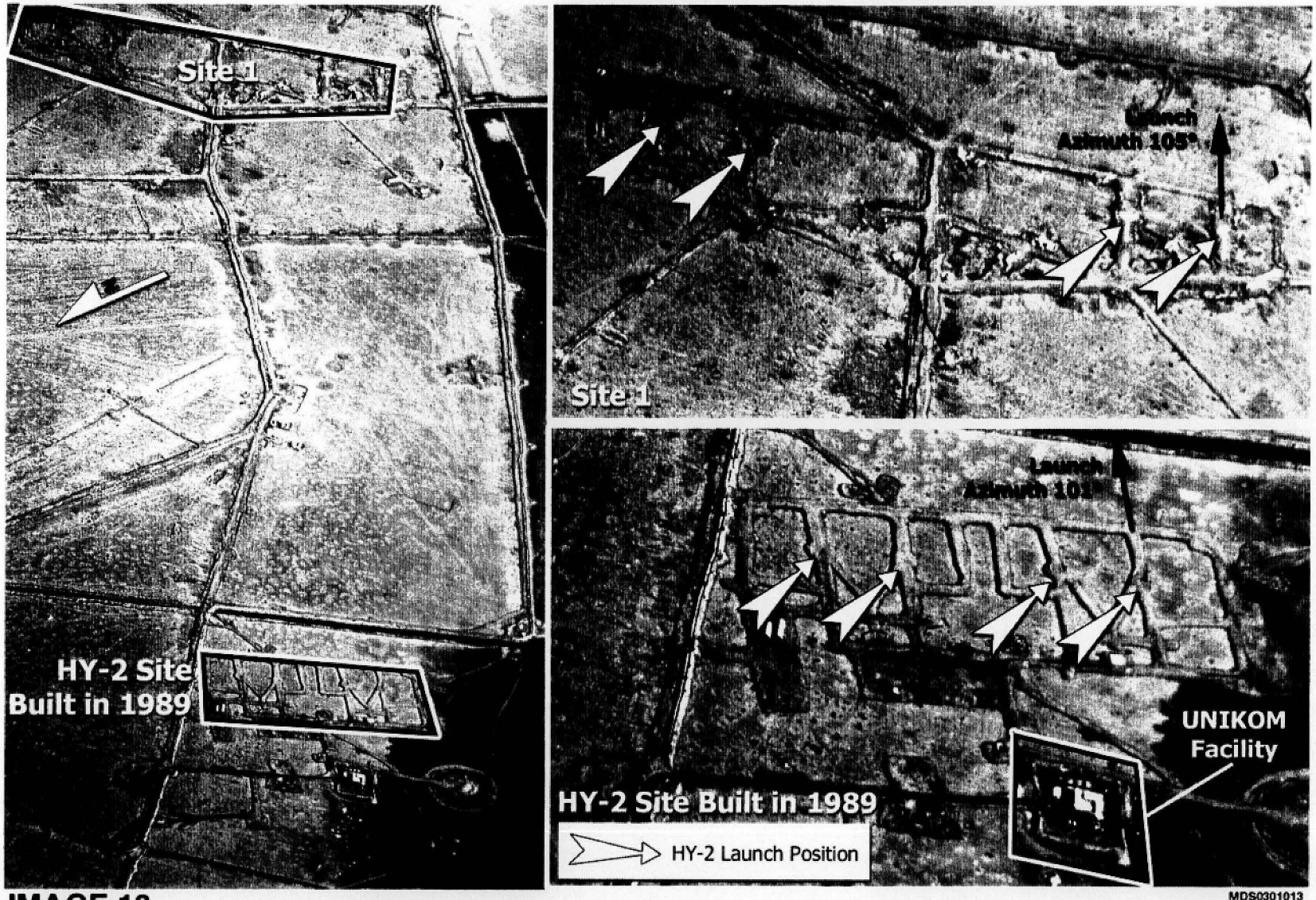
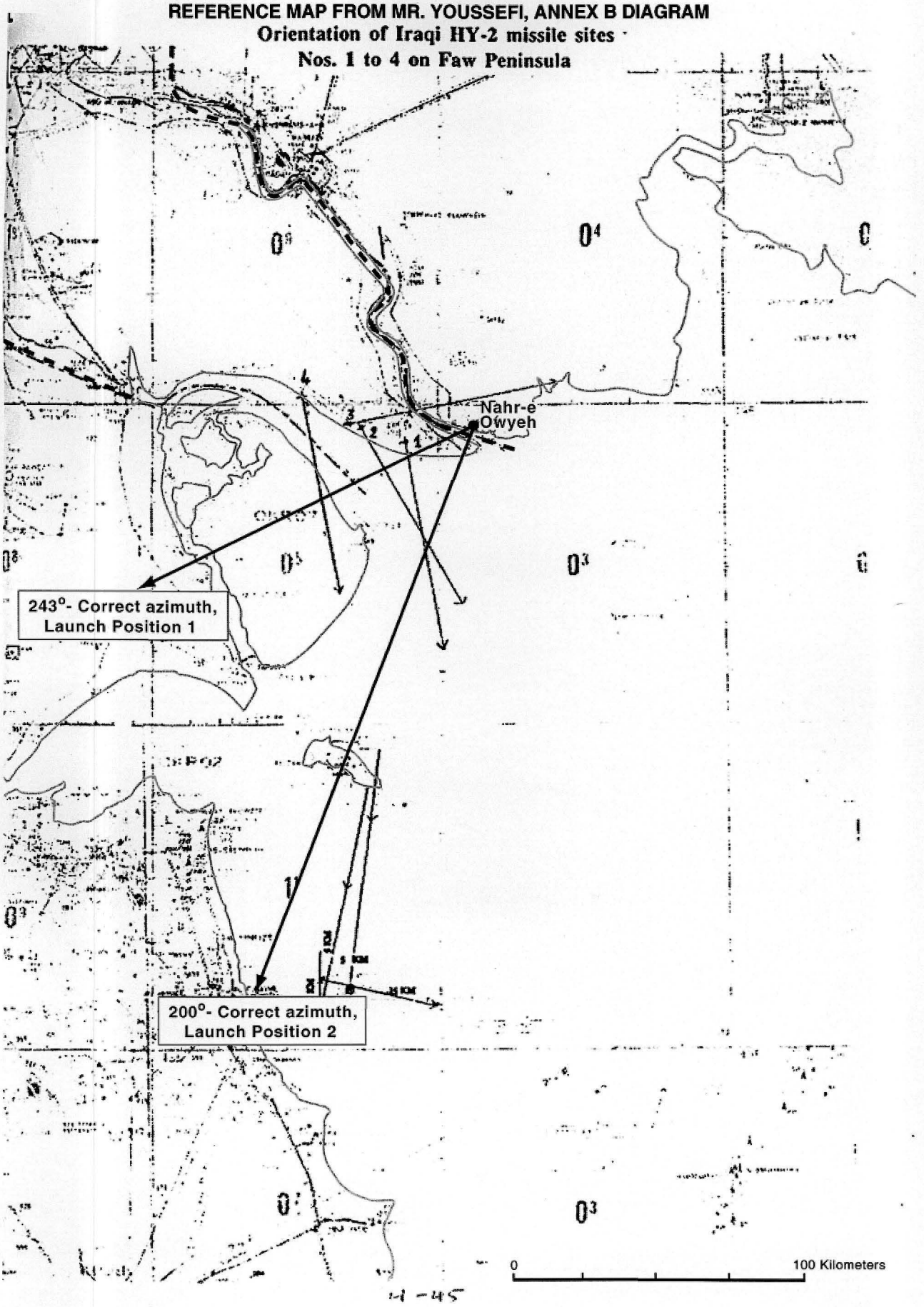


IMAGE 13

REFERENCE MAP FROM U.S. EXHIBIT 210

REFERENCE MAP FROM MR. YOUSSEFI, ANNEX B DIAGRAM

Orientation of Iraqi HY-2 missile sites Nos. 1 to 4 on Faw Peninsula



4-45

MDS0301015

EXHIBIT 263

Diplomatic Note from the Royal Norwegian Embassy, Washington, D.C., to the United States Department of State, November 20, 2002

ROYAL NORWEGIAN EMBASSY
WASHINGTON, D.C.

No 59/02

The Royal Norwegian Embassy presents its compliments to the United States Department of State and has the honour to refer to a communication of 23 September 2002 from the Legal Adviser of the Department of State, by which it indicated that, in connection with proceedings before the International Court of Justice in the Oil Platforms Case (Iran v. United States), questions had arisen relating to excerpts from a Royal Ministry of Foreign Affairs cable submitted as evidence by the United States. The cable in question, dated 12 February 1988, is from the Norwegian ambassador in Tehran to the Ministry and concerns a Norwegian protest for attacks carried out on 3 February that year against Norwegian-registered vessels navigating in international waters in the Gulf. The communication from the Department of State requested any comments the Ministry might be able to provide regarding this cable. The Embassy has been instructed to convey the following information:

Based on archival research and interviews with the personnel involved at that time, the Ministry hereby confirms that the cable in question is, in fact, an authentic Royal Ministry of Foreign Affairs document, and that it was sent by the Norwegian Ambassador in Tehran to the Ministry on 12 February 1988. Based on this fact-finding the Ministry would, for the sake of good order, like to add that it is not in possession of any information which gives reason to doubt the accuracy of the reporting contained in that cable. On the contrary, the Norwegian authorities relied on it in their analysis of the serious situation facing international shipping in that area at the time, and which to a considerable extent adversely affected Norwegian interests and endangered Norwegian seamen's lives.

The Royal Ministry of Foreign Affairs would like to inform the United States Department of State that the above information and this letter in no way imply any taking of position, nor any expression of views with regard to the dispute between the two parties in the case pending before the International Court of Justice. The Ministry does not intend, nor is it in a position, to provide any further information or observations in this matter.

The above information will also be conveyed to the Islamic Republic of Iran through its Embassy in Oslo.

The Royal Norwegian Embassy avails itself of this opportunity to renew to the United States Department of State the assurances of its highest consideration.

20 November 2002

ROYAL NORWEGIAN EMBASSY - WASHINGTON, D.C.

United States Department of State
Washington D.C.