

Overlapping claims for an extended continental shelf in the Northeastern part of South America facing the Atlantic Ocean



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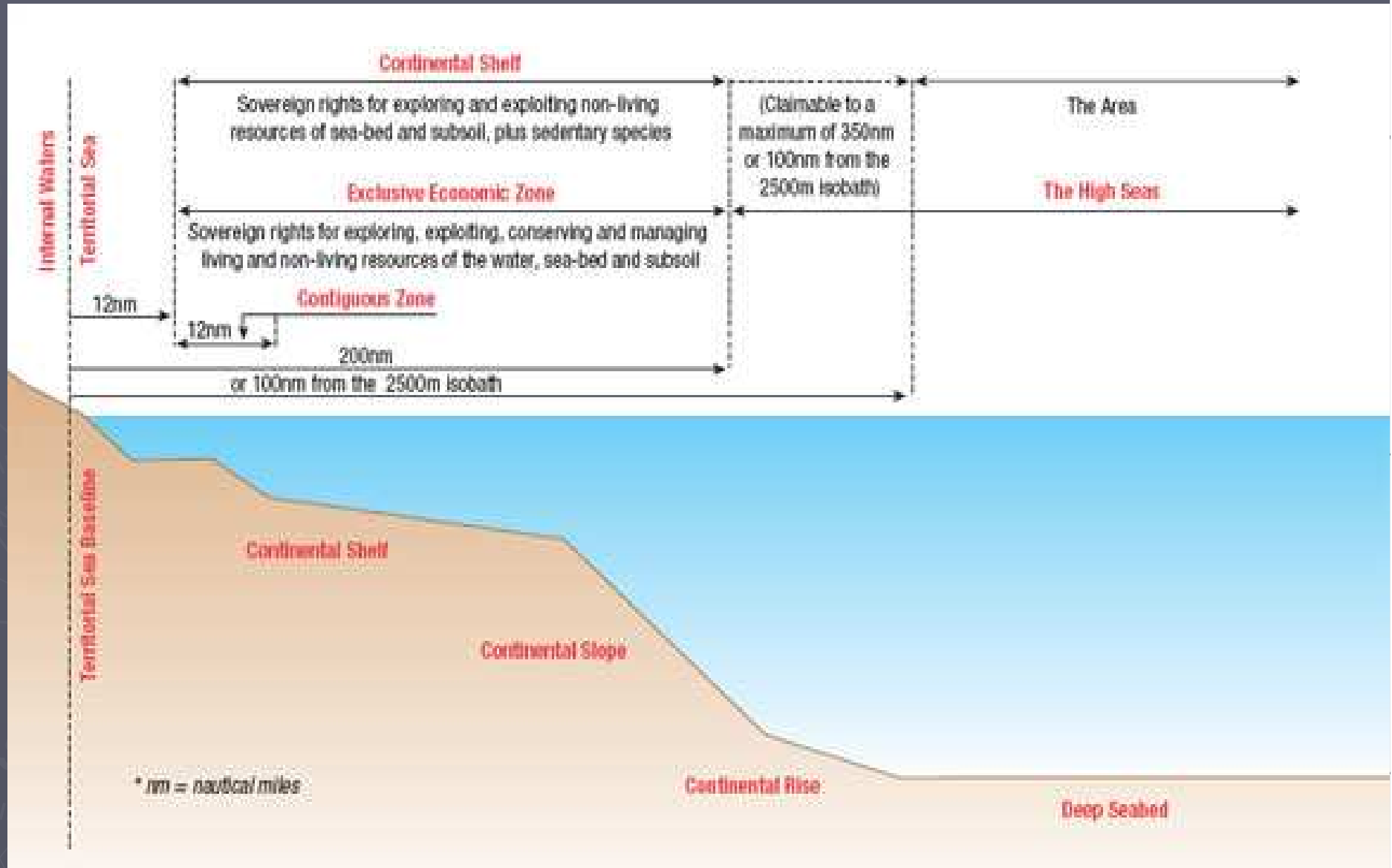
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Summary

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Maritime Zones



Outline

- ▶ The way *recent arbitral awards* establishing the maritime boundaries between some States in the Northeastern part of South America and the Caribbean facing the Atlantic Ocean *have considered and given weight to the concept of natural prolongation* related to the establishment of the outer limits of the continental shelf ("CS") beyond 200 nautical miles ("M"), also known as the "extended continental shelf" or "ECS"
- ▶ The *consequences* of the ensuing submissions to the Commission on the Limits of the Continental Shelf ("CLCS") and the *reactions* of States to those submissions

Objective

- ▶ Highlight some gaps and discrepancies among the submissions made to the CLCS by States located in the Northeastern part of South America and the Caribbean facing the Atlantic Ocean
- ▶ Draw the attention to the complex factual and legal situation surrounding the area under study

Key issues

1. How did the CS institution arise (scientific-technical vs. legal)?
2. ***Are the seabed and subsoil in the EEZ independent from the CS regime?***
3. What is the relation between Art. 76 of UNCLOS and the delimitation of the CS between States?
4. ***Have legal arguments replaced scientific and technical evidence when establishing an ECS?***
5. ***Are arbitral tribunals unwilling to deal with physical features of the ECS?***
6. Are the concept of natural prolongation and test of appurtenance still relevant when establishing an ECS?
7. Is the principle of continuity still relevant when establishing an ECS based on the Gardiner Formula?
8. ***What is the linkage between the CLCS and the process of delimitation of boundaries?***
9. ***In case of a dispute, what should the coastal State making the submission do?***
10. ***What should the role of the CLCS be in case of a dispute?***
11. What should the subcomission do, should there be a need for further clarification?

Part 1: Introduction

- ▶ The continental shelf comprises the seabed and subsoil that are the ***natural prolongation*** of a coastal State beyond its territorial sea, ***up to the outer edge of the continental margin***. Where the continental margin does not reach the distance of 200 M from the baselines, the continental shelf is measured up to 200 M from its baselines
- ▶ According to ***customary international law***, coastal States exercise sovereign rights over the continental shelf which is appurtenant, without the need for an express or formal proclamation
- ▶ Since its origin and its subsequent evolution and consolidation as an institution, the continental shelf has been linked to the concept of natural prolongation of the land territory. In other words, ***geological and geomorphological features of the continental shelf (scientific and technical criteria) are essential to it***

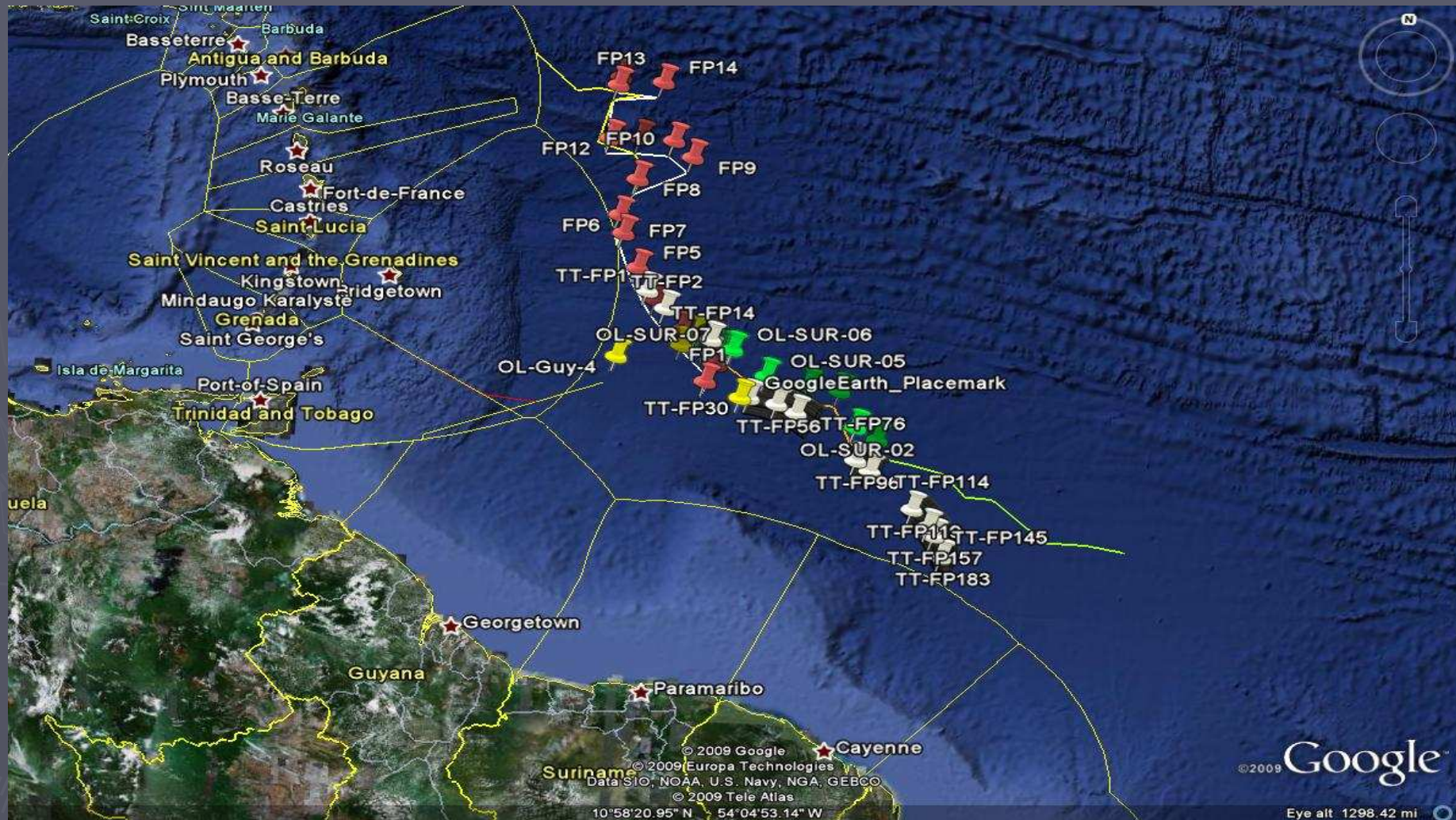
Part 1: Introduction

Extended continental shelf submissions to the CLCS as of 13 May 2009 deadline



Part 1: Introduction

Map of the area in the Atlantic Ocean where the extended continental shelves of Barbados, Guyana, Suriname, Trinidad and Tobago and Venezuela converge and overlap



Source: Maps were adapted by Author from Google Earth, 2009 (<http://earth.google.com/>). This map as well as the rest of the maps from Google Earth are for illustrative purposes only.

Part 2: Relevant factual and legal background

- ▶ Venezuela-United Kingdom Delimitation Treaty (Gulf of Paria Treaty) of 1942
- ▶ Truman Proclamation of 1945
- ▶ Geneva Convention on the Continental Shelf of 1958
- ▶ North Sea Continental Shelf Cases of 1969
- ▶ ***United Nations Convention on the Law of the Sea ("UNCLOS") of 1982***
- ▶ The Guinea-Guinea Bissau arbitral award of 1985
- ▶ ***The Venezuela-Trinidad and Tobago Delimitation Treaty of 1990***
- ▶ ***The Barbados-Guyana EEZ Co-operation Treaty of 2003***

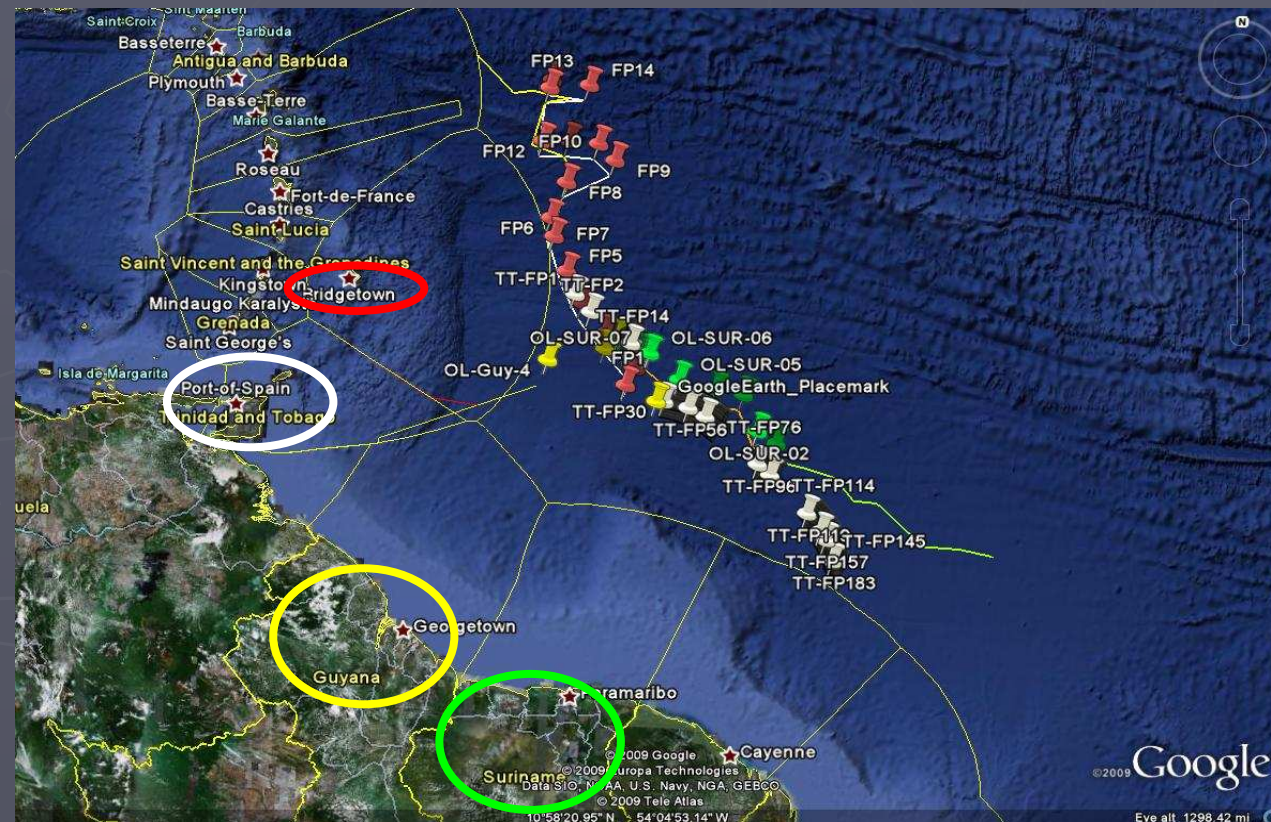
Part 2: Relevant factual and legal background

Article 76 of UNCLOS

- ▶ The Scientific and Technical Guidelines of the CLCS summarize the process in the following terms: *where the natural prolongation of a coastal State to the outer edge of the continental margin extends beyond 200 M from the baselines from which the breadth of the territorial sea is measured*, the outer limits of the continental shelf *can be extended*:
 - ▶ up to a 1% sediment thickness line (*Gardiner Formula*), or
 - ▶ to a line delineated at a distance of 60 M from the foot of the slope (*Hedberg Formula*), *and not further than*:
 - ▶ a line delineated at a distance of **350 M** from the baselines from which the breadth of the territorial sea is measured, or
 - ▶ no further than a line delineated at a distance of **100 M** from the **2,500 metre** isobaths

Part 3: Recent relevant arbitral awards

- ▶ The arbitral award of 2006 (Barbados-Trinidad and Tobago)
- ▶ The arbitral award of 2007 (Guyana-Suriname)



Part 3: Recent relevant arbitral awards

The arbitral award of 2006: Parties' claims

- ▶ **Barbados:** Single maritime boundary *but* "special circumstance" (artisanal fishing). *Constrained from reaching a full ECS claim by the presence of* Trinidad and Tobago, *Venezuela*, Guyana and Suriname (para. 157).
- ▶ **Trinidad and Tobago:** Divided the disputed area into two areas, the "Caribbean sector" and the "Atlantic sector" *but* in the latter area it was entitled to a full maritime zone, including continental shelf (analogy to "adjacent States"). Claim *south* of the Venezuela-Trinidad and Tobago Delimitation Treaty of 1990: *Dispute between Venezuela and Barbados* (Hearings, Day 7, pp. 25-26)

Part 3: Recent relevant arbitral awards

The arbitral award of 2006: Reasoning of the Tribunal and analysis

- ▶ **Tribunal:** Its jurisdiction *included* the delimitation of the *ECS* though *geographical criteria prevailed over area-specific criteria such as geomorphological aspects* (para. 228)
- ▶ **Analysis:** Deciding on an *ECS without* considering *geomorphological aspects?*
- ▶ **Tribunal:** *No jurisdiction in respect of maritime boundaries between either of the Parties and any third State* (para. 218).
- ▶ **Analysis:** St. Pierre and Miquelon case of 1992, the Court held, that any decision recognizing or rejecting any rights of the Parties *over the ECS* would constitute a pronouncement involving a delimitation, not “between the Parties” but between each one of them and the *international community*

Part 3: Recent relevant arbitral awards

The arbitral award of 2006: Reasoning of the Tribunal and analysis

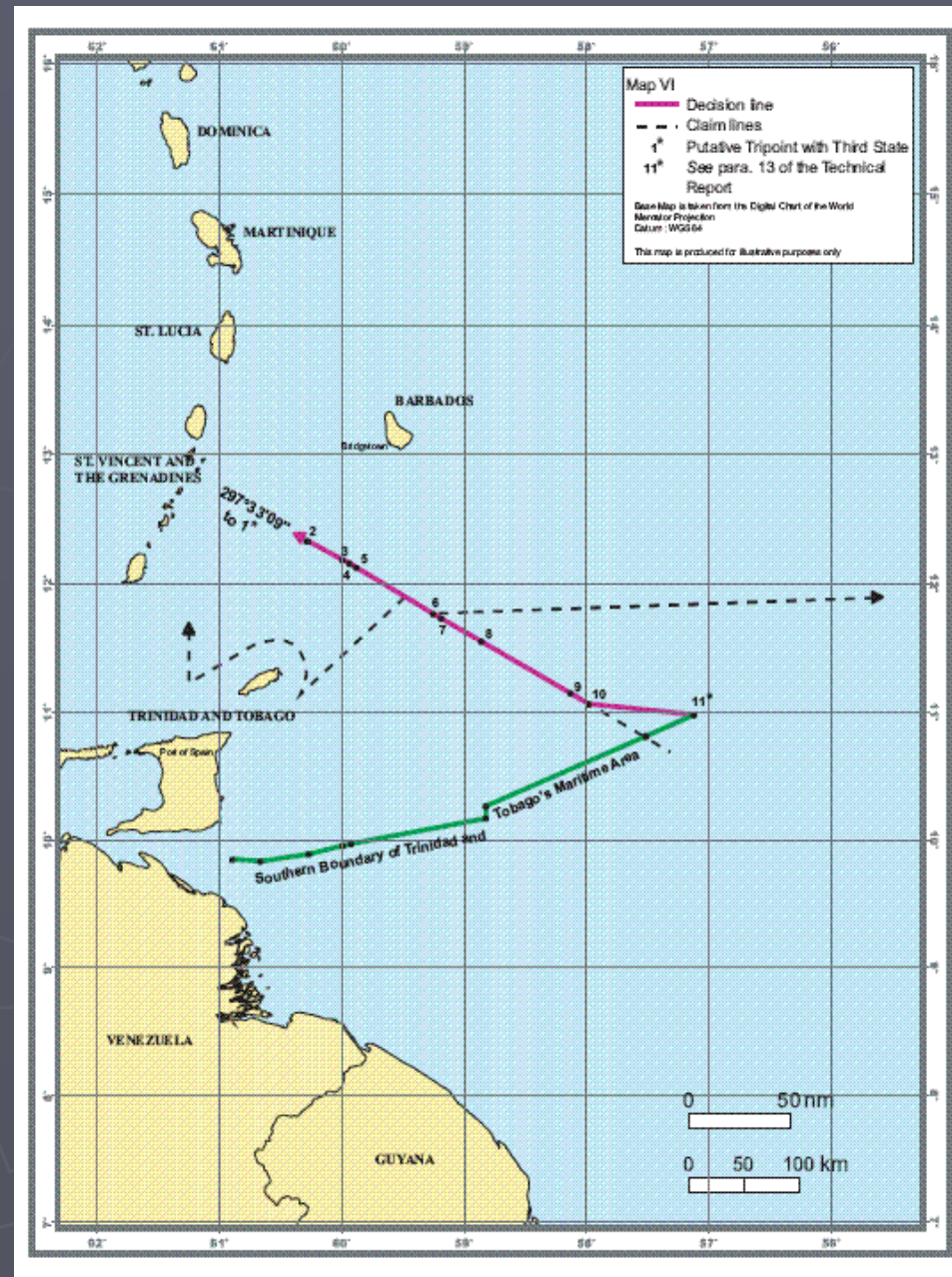
- ▶ **Tribunal:** In the regime of the EEZ under UNCLOS (**Article 56**), *distance is the sole basis of the coastal State's entitlement to both the seabed and subsoil and the superjacent waters* (para. 225).
- ▶ **Analysis:** Paragraph 3 of Article 56 establishes: "The rights set out in this article with respect to the seabed and subsoil shall be exercised in accordance with Part VI" (*Continental Shelf*)
- ▶ **Tribunal:** Not persuaded by the distinction between the "Caribbean sector" and the "**Atlantic sector**" (para. 313)
- ▶ **Analysis:** In the "**Atlantic sector**":
 - Venezuela-Trinidad and Tobago Delimitation Treaty of 1990
 - Ongoing process of Good Offices led by the UN Secretary-General pursuant to the Agreement to resolve the controversy between Venezuela and British Guiana of 1966 ("1966 Geneva Agreement")
 - A pending award of the Guyana-Suriname arbitration
 - Guinea and Guinea-Bissau arbitration of 1985, the Tribunal held that a delimitation designed to obtain an equitable result **cannot ignore the other delimitations already made or still to be made in the region**

Part 3: Recent relevant arbitral awards

The arbitral award of 2006: Questions

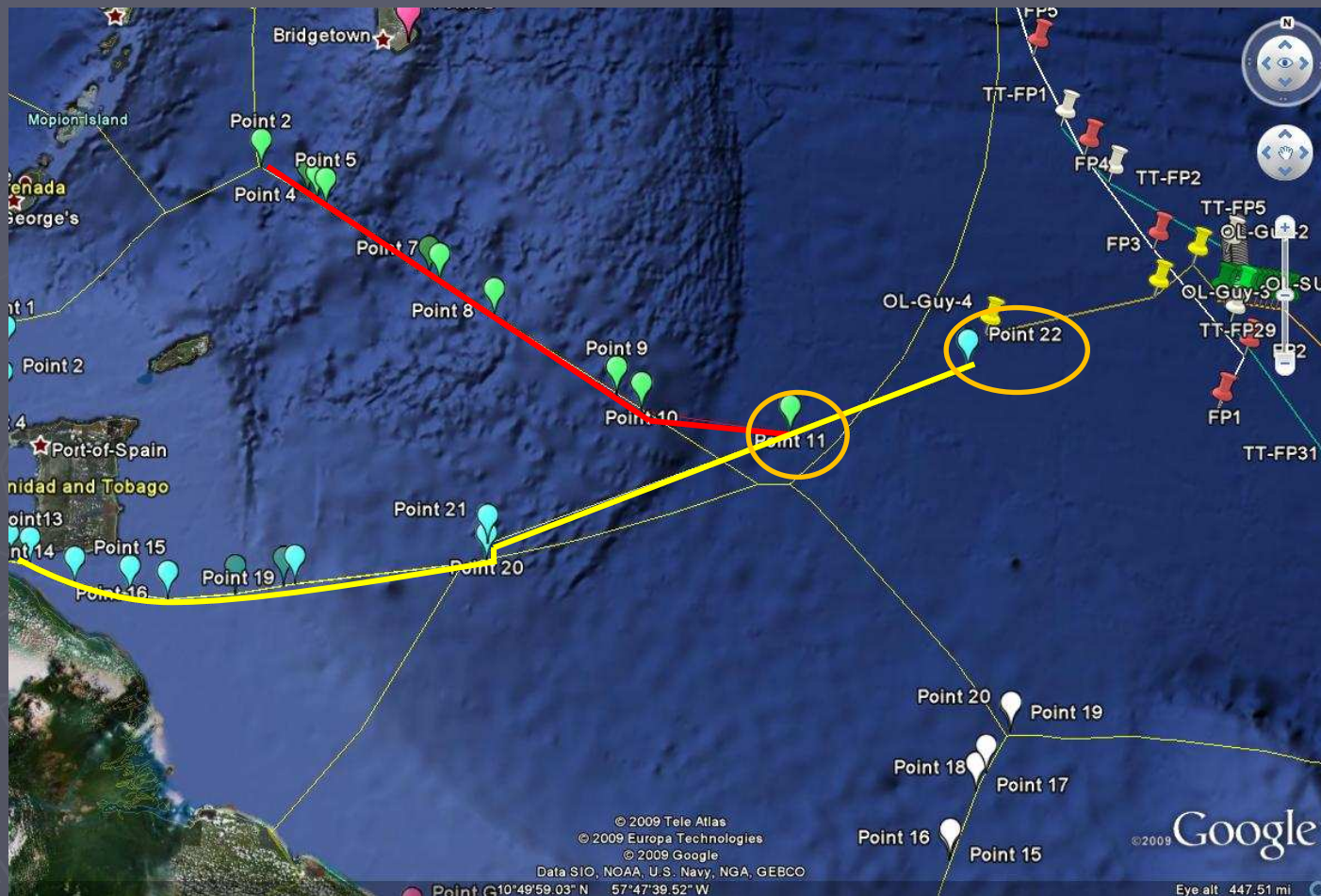
- ▶ What would happen if one of the Parties was not in a position to establish the outer limits of its continental shelf beyond 200 M? Having reached the 200 M based on the distance criterion, what would happen if that Party was unable to prove the absence of interruption of its natural prolongation between the 200 M and the outer limits of the continental shelf?
- ▶ In such case, would not that claim affect the *rights of third States or the international community?*

Source: Arbitral Tribunal Constituted Pursuant to Article 287, and in accordance with Annex VII, of the United Nations Convention on the Law of the Sea, In the Matter of an Arbitration between Barbados and Trinidad and Tobago, The Hague, 11 April 2006.



Part 3: Recent relevant arbitral awards

Map showing the Decision Line of the arbitral award of 2006 (Barbados-Trinidad and Tobago) in the context of the Study Area



- 1990 Treaty Venezuela-Trinidad and Tobago
- 2006 Arbitral Award Barbados-Trinidad and Tobago

Part 3: Recent relevant arbitral awards

The arbitral award of 2007: Parties' claims

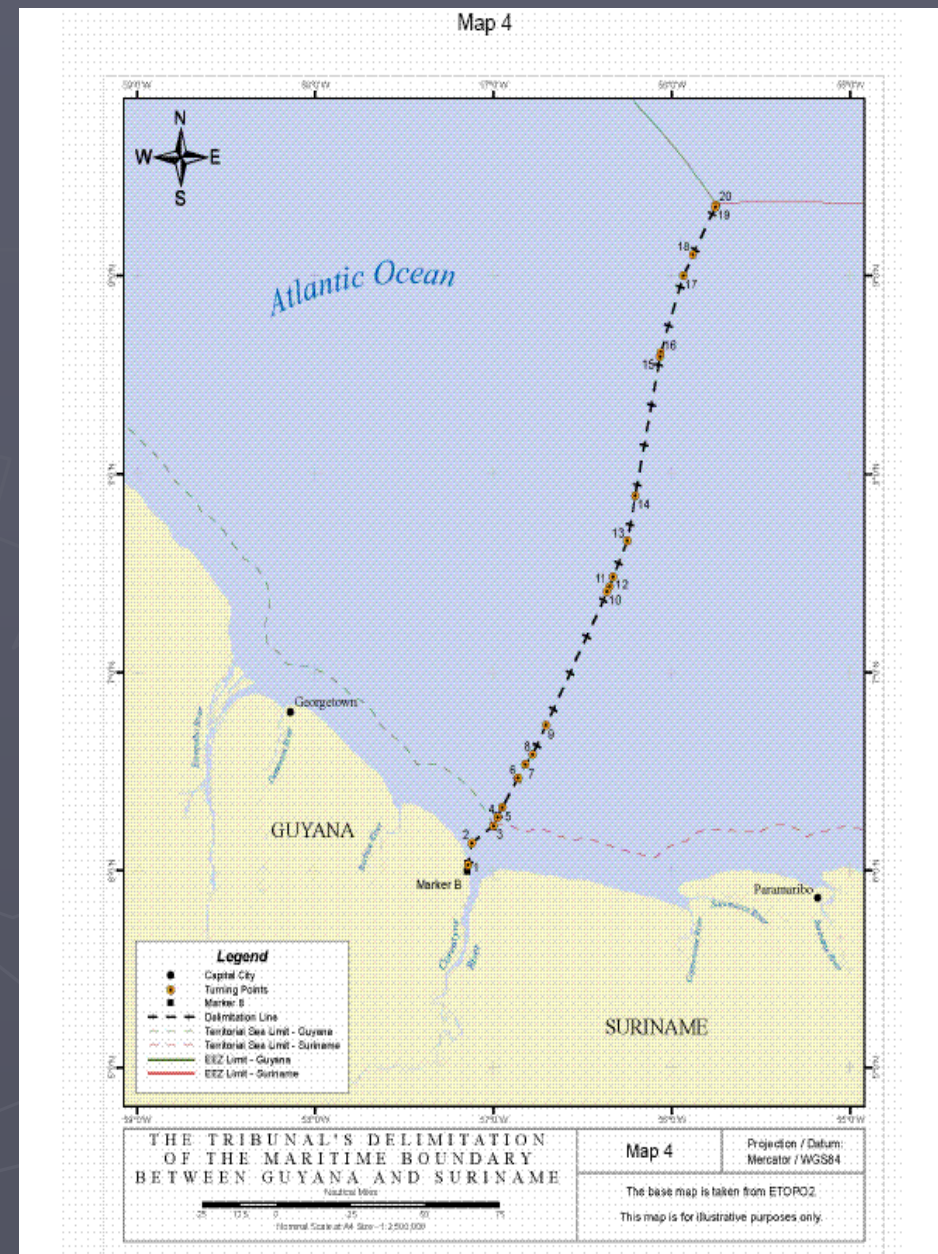
- ▶ **Guyana:** Single maritime boundary. Did not refer to the *1966 Geneva Agreement* and the desire expressed by both States for the continuation of the Good Offices Process of the UN Secretary-General (“*the land dominates the sea*”)
- ▶ **Suriname:** Also requested a single maritime boundary (“Undisputable fact that a portion of the coast of Guyana is also claimed by Venezuela”, Suriname’s Rejoinder, para. 3.169, footnote 411)

Part 3: Recent relevant arbitral awards

The arbitral award of 2007: Reasoning of the Tribunal and analysis

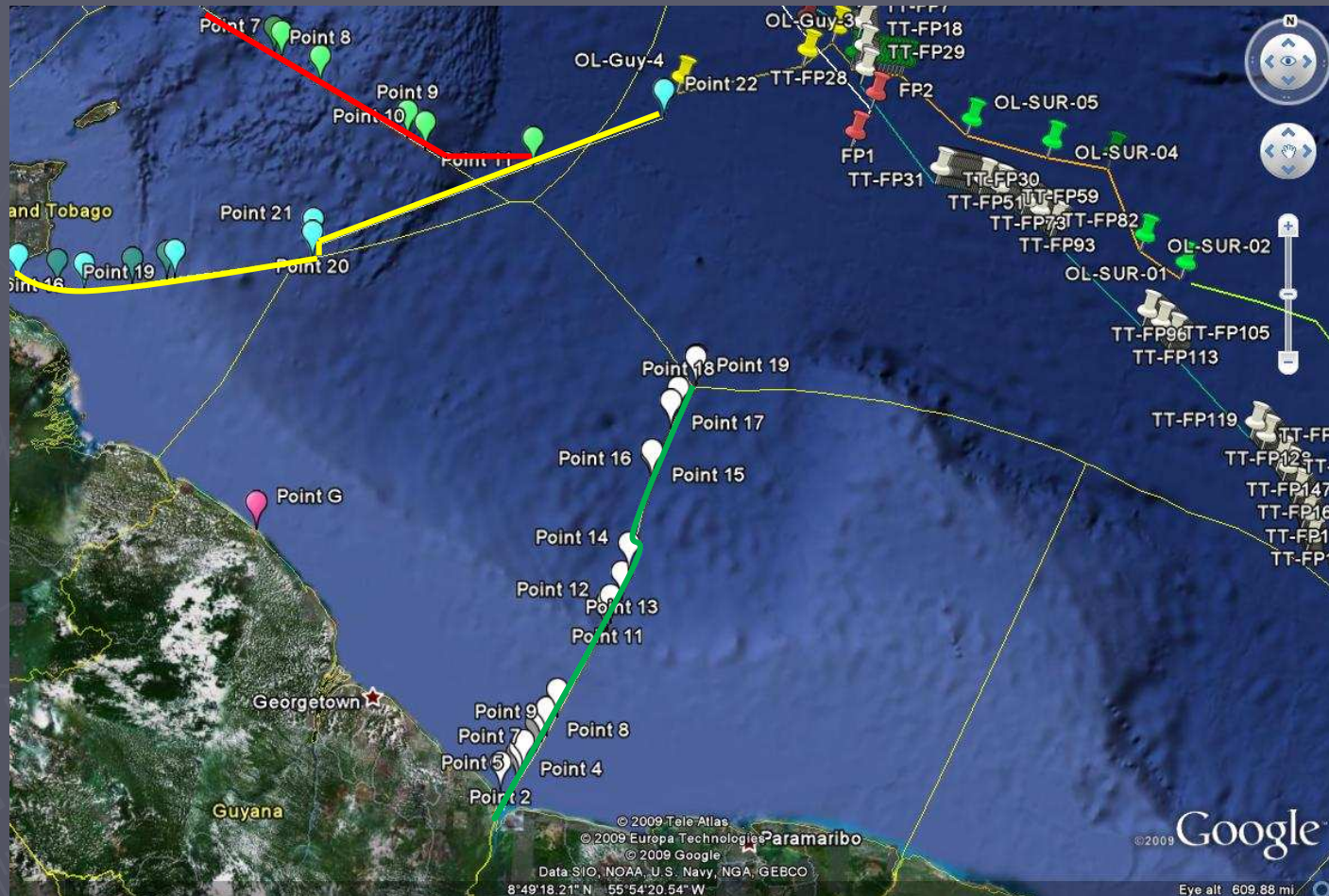
- ▶ **Tribunal:** Not invited to delimit the ECS. The Parties themselves had agreed that geological or geophysical factors were of no relevance in this case
- ▶ **Analysis:** A major difference between this award and the award of 2006 (Barbados-Trinidad and Tobago)

Source: Arbitral Tribunal Constituted Pursuant to Article 287, and in accordance with Annex VII, of the United Nations Convention on the Law of the Sea, in the Matter of an Arbitration between Guyana and Suriname, The Hague, 17 September 2007.



Part 3: Recent relevant arbitral awards

Map showing the Tribunal's Delimitation of the Maritime Boundary in the arbitral award of 2007 (Guyana-Suriname) in the context of the Study Area



- 1990 Treaty Venezuela-Trinidad and Tobago
- 2006 Arbitral Award Barbados-Trinidad and Tobago
- 2007 Arbitral Award Guyana-Suriname

Part 4: Submissions to the CLCS and reactions by neighboring States

- ▶ Submission by **Barbados** (Executive Summary) to the CLCS of 2008
 - Reaction by *Suriname* of 2008
 - Reaction by *Trinidad and Tobago* of 2008
 - Reaction by *Venezuela* of 2008
- ▶ Submission by **Suriname** (Executive Summary) to the CLCS of 2008
 - Reaction by *France* of 2008
 - Reaction by *Trinidad and Tobago* of 2009
 - Reaction by *Barbados* of 2009
- ▶ Submission by **Trinidad and Tobago** (Executive Summary) to the CLCS of 2009
 - Reaction by *Suriname* of 2009
- ▶ Part I of the Submission by **Guyana** (Executive Summary/Preliminary information) to the CLCS of 2009

Part 4: Submissions to the CLCS and reactions by neighboring States

Submission by **Barbados** (Executive Summary) to the CLCS of 2008

► Executive Summary:

- Divided ECS into two sections: "***Southern Area***" and "***Northern Area***"
- Formula line applied: Sediment thickness formula (***Gardiner formula***), with the exception of two points [FP6 and FP7 (200 M)]

► Analysis:

- No reference either to the ***concept of natural prolongation*** or to the ***test of appurtenance / (principle of continuity)*** (CLCS/11, para. 2.1.2.)
- Barbados's "***Southern Area***": In spite of its affirmation during the arbitral procedures of being ***constrained*** from reaching a ***full ECS*** claim by the presence of, *inter alia*, ***Venezuela*** (para. 157), Barbados did not consult with the latter prior to its submission to the CLCS
- In "***Absence of Disputes***", there is no reference to ***Annex I, paragraph 2(a) of the Rules of Procedures of the CLCS***

Part 4: Submissions to the CLCS and reactions by neighboring States

Map showing the full outer limit line for the continental shelf of Barbados

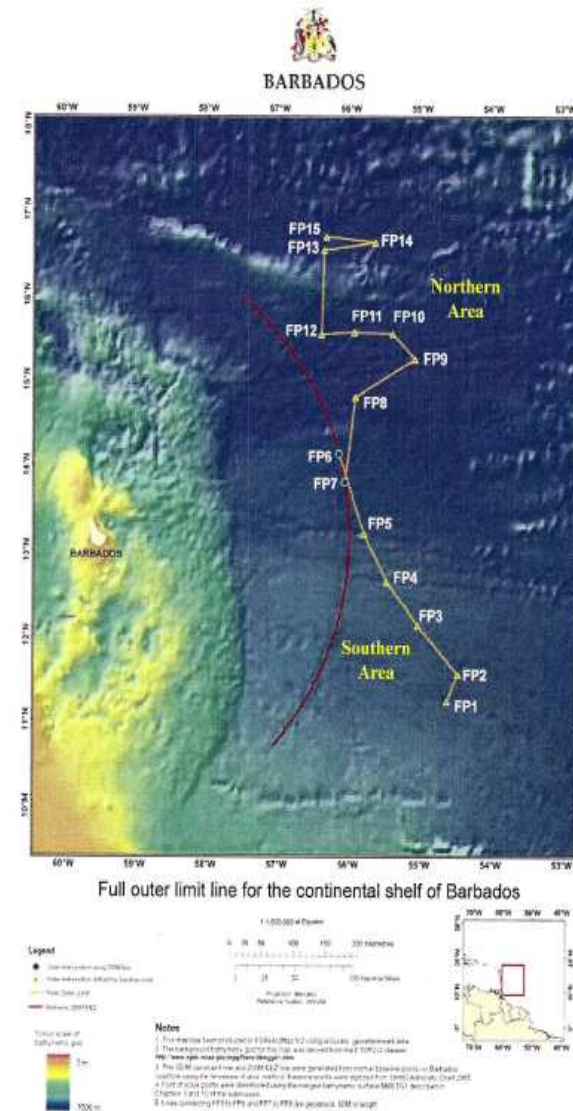
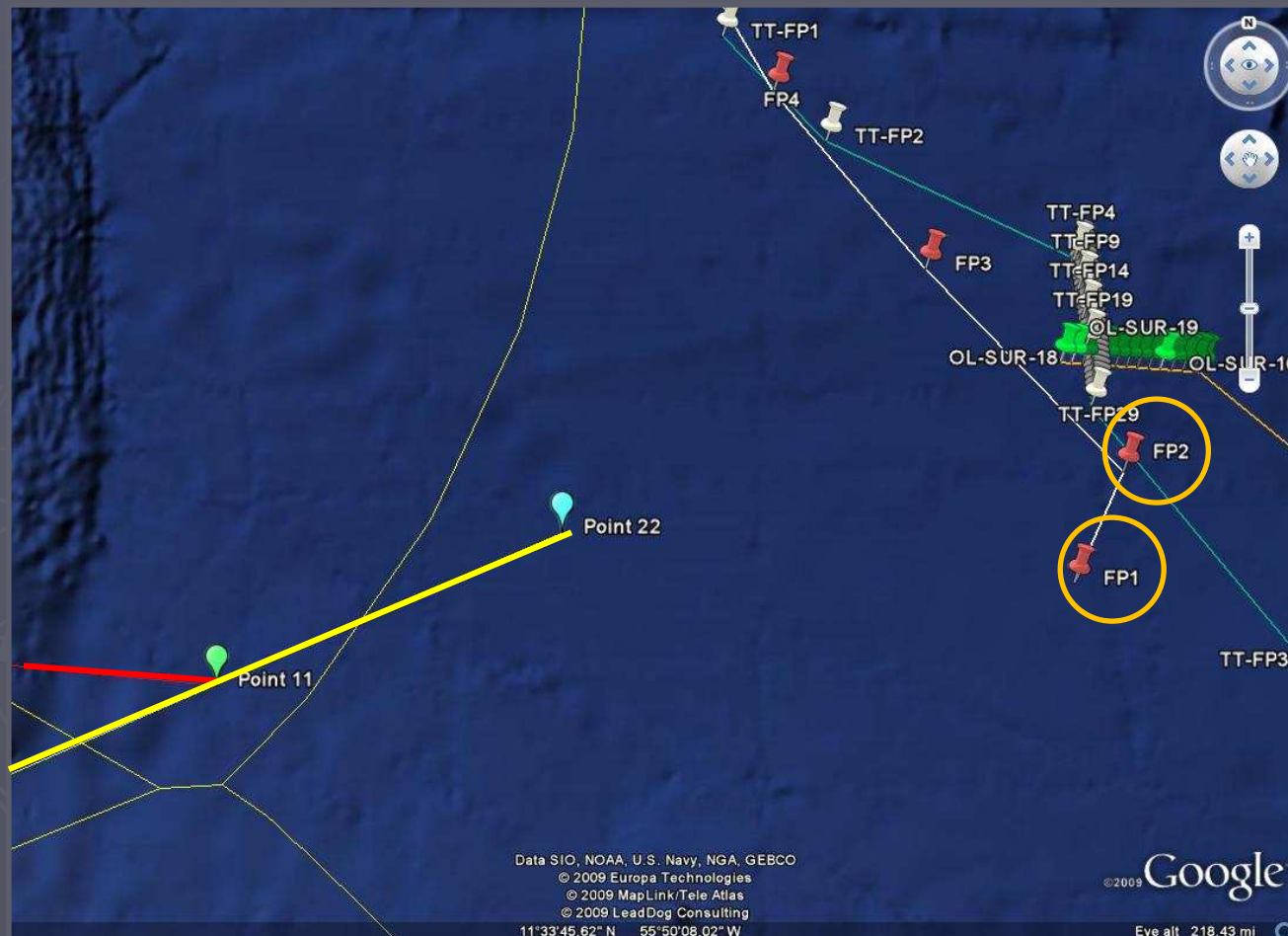


Figure 1: Map showing the final outer limit of the continental shelf of Barbados

Part 4: Submissions to the CLCS and reactions by neighboring States

Barbados submission ("*Southern Area*"): Points FP1 and FP2, are located *Southeastern* of the prolongation of the line established by the Venezuela-Trinidad and Tobago Delimitation Treaty of 1990



————— 1990 Treaty Venezuela – Trinidad and Tobago
————— 2006 Arbitral award Barbados-Trinidad and Tobago

Part 4: Submissions to the CLCS and reactions by neighboring States

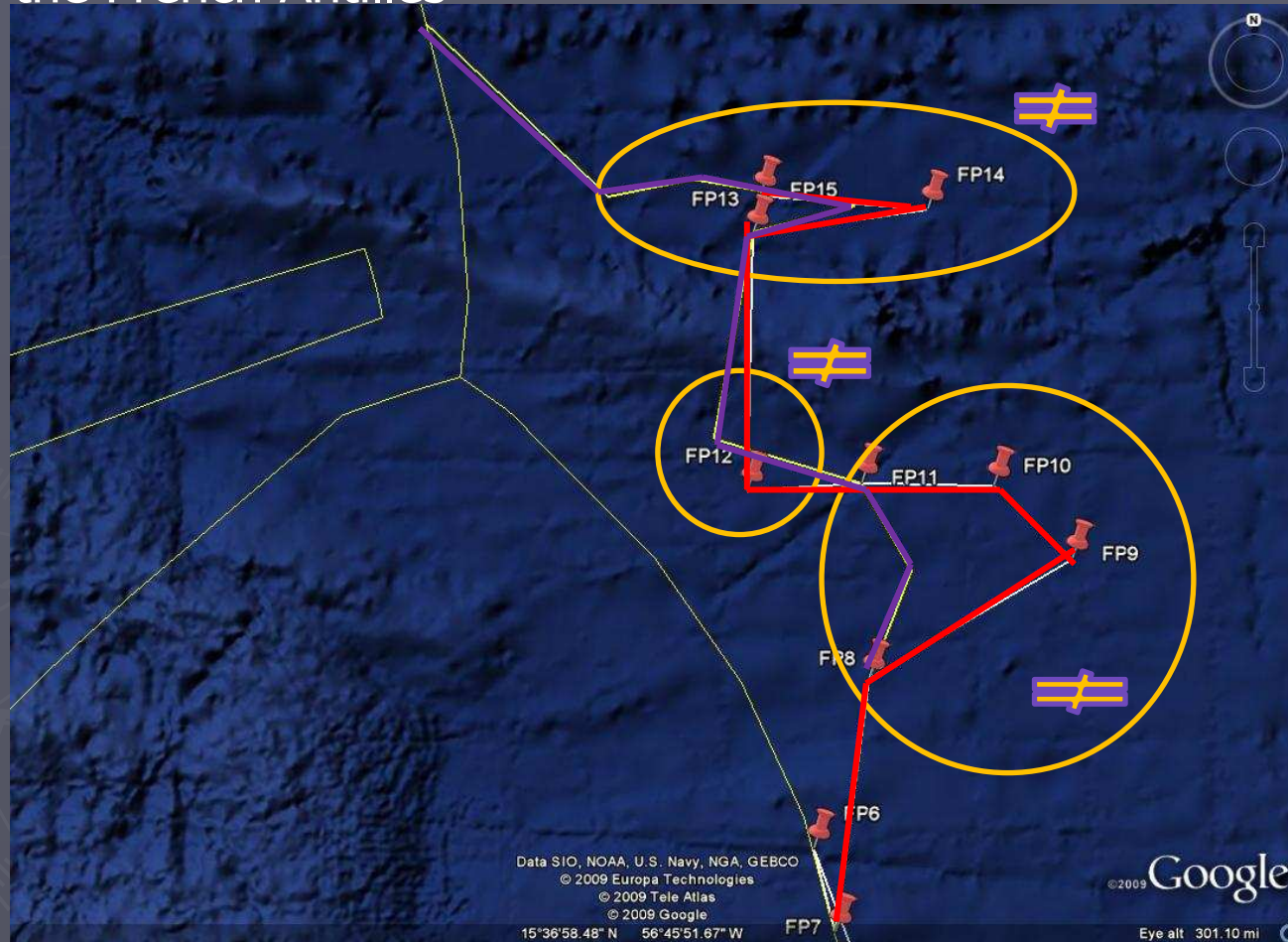
Barbados submission: Points *FP6* and *FP7*, both located at 200 M and that establish the end of the "Southern Area" and the beginning of the Northern Area indicate lines, towards points *FP5* and *FP8* respectively, that cross in an intersection that is not explained in the Executive Summary



— Barbados

Part 4: Submissions to the CLCS and reactions by neighboring States

Barbados submission ("Northern Area"): Discrepancy between the information submitted by Barbados and that submitted by France on behalf of the French Antilles



— Barbados
— France

Part 4: Submissions to the CLCS and reactions by neighboring States

Reactions by neighboring States

- Reaction by *Suriname*: Informs that it has continental shelf entitlement in the Barbadian "*Southern Area*"
- Reaction by *Trinidad and Tobago*: Rejects Barbados contention that the award of 2006 had determined the respective areas of maritime entitlement and informs its intention of making a submission
- Reaction by *Venezuela*: Reaffirms that, in accordance with *customary international law*, the rights over its ECS have not been affected by the Barbadian submission ("*Southern Area*") and informs that Barbados did not confer with it prior to making its submission (*Annex I, paragraph 2(a) of the Rules of Procedures of the CLCS*)

Part 4: Submissions to the CLCS and reactions by neighboring States

Submission by **Suriname** (Executive Summary) to the CLCS of 2008

▶ Executive Summary:

- ▶ Formula and constraint line applied: Sediment thickness formula (*Gardiner formula*) in the eastern area, *constraint line (350 M)* in the western area

▶ Analysis:

- ▶ Description of geological and geomorphological features of its ECS (*concept of natural prolongation / test of appurtenance* (CLCS/11, para. 2.1.2.))
- ▶ Barbados's "*Southern Area*" claimed not based on the *Gardiner formula* but on the *350 M constraint line*
- ▶ In "*Absence of Disputes*", it refers to *Annex I, paragraph 2(a) of the Rules of Procedures of the CLCS*

Part 4: Submissions to the CLCS and reactions by neighboring States

Map showing the outer limit line for the continental shelf of **Suriname**

Executive Summary – Continental Shelf Submission of the Republic of Suriname

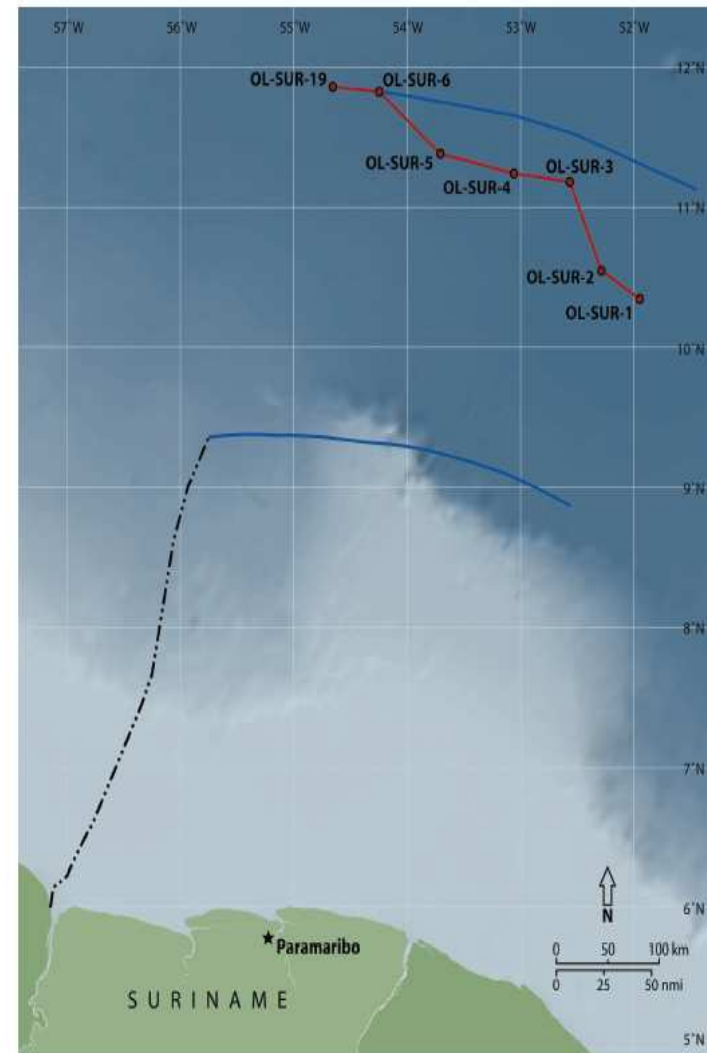


Figure 2: Map showing the outer limit line of the continental shelf of Suriname.

Source: Government of the Republic of Suriname, Submission for the Establishment of the Outer Limits of the Continental Shelf of Suriname pursuant to Article 76, paragraph 8 of the United Nations Convention on the Law of the Sea, Executive Summary, 2008, p. 6.

Part 4: Submissions to the CLCS and reactions by neighboring States

Suriname's

submission:

Difference between point *OL-SUR-019* and the southernmost points of the Barbadian submission (*FP1*, *FP2* and *FP3* in the "Southern Area"), all located in the same area. While *Suriname* relied on the *350 M constraint line*, *Barbados* claimed virtually the same area based on the *Gardiner formula*



— Barbados (Gardiner Formula)

— Suriname (350 M Constraint Line)

Part 4: Submissions to the CLCS and reactions by neighboring States

Submission by **Trinidad and Tobago** (Executive Summary) to the CLCS of 2009

▶ Executive Summary:

- Formula and constraint lines applied: Sediment thickness formula (*Gardiner formula*) in the northern area, *constraint lines* in the southern area (*350 M* and *2,500 m + 100 M*)

▶ Analysis:

- Description of geological and geomorphological features of its ECS (*concept of natural prolongation / test of appurtenance* (CLCS/11, para. 2.1.2.))
- Barbados's "*Southern Area*" claimed also under the *Gardiner formula*, although nearby areas under the *350 M constraint line*
- In "*Absence of Disputes*", it refers to *Annex I, paragraph 2(a) of the Rules of Procedures of the CLCS*

Part 4: Submissions to the CLCS and reactions by neighboring States

Map showing the outer limit line for the continental shelf of **Trinidad and Tobago**

Trinidad and Tobago Continental Shelf Submission Executive Summary

16. The outer limit of the Trinidad and Tobago continental shelf and list of coordinates

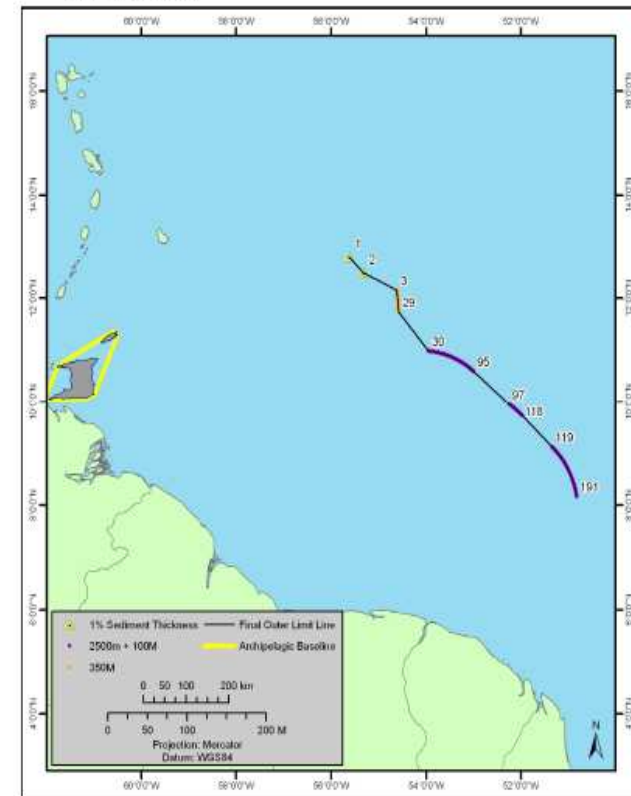


Figure 3: Outer limit of the continental shelf of Trinidad and Tobago

Part 4: Submissions to the CLCS and reactions by neighboring States

Trinidad and Tobago's

submission: The line from points TT-FP1 to TT-FP2 cuts the line of Barbados between points FP4 and FP5. Both States relied in this area on the Gardiner formula



- Barbados (Gardiner Formula)
- Trinidad and Tobago (Gardiner Formula)

Part 4: Submissions to the CLCS and reactions by neighboring States

Trinidad and Tobago's submission: The line between point TT-FP21 and TT-FP22 cuts Suriname's submission between OL-SUR-16 and OL-SUR-17. Both used in the same area probably the 350 M constraint line. From points TT-FP22 to TT-FP29, all located to the south of Suriname's submission, both States used the 350 M constraint line



- Trinidad and Tobago (350 M Constraint Line)
- Suriname (350 M Constraint Line)

Part 4: Submissions to the CLCS and reactions by neighboring States

Trinidad and Tobago's submission: From *TT-FP30* to *TT-FP96*, while *Suriname* relies on the Gardiner formula, *Trinidad and Tobago* relies on the *2,500 m + 100 M constraint line*. Approximately, from point *TT-FP96* to *TT-FP191*, *Trinidad and Tobago's* submission overlaps with that of *France* made on behalf of *French Guiana*



- Suriname (Gardiner Formula)
- Trinidad and Tobago (2,500 m+100 M Constraint Line)
- France

Part 4: Submissions to the CLCS and reactions by neighboring States

Part I of the Submission by **Guyana** (Executive Summary/Preliminary Information) to the CLCS of 2009

▶ **Executive Summary:**

- ▶ Formulae lines and constraint line applied: Sediment thickness formula (*Gardiner formula*) and foot of the slope + 60 M (*Hedberg formula*), with the *350 M constraint line*

▶ **Analysis:**

- ▶ Mentions the *concept of natural prolongation* and the *test of appurtenance*, although does not refer to the source of the sedimentary apron (*principle of continuity*) (CLCS/11, para. 8.5.3.)
- ▶ Barbados's "*Southern Area*" also claimed, although *does not* specify under which formula or constraint line
- ▶ In its "*Absence of Disputes*", there is *neither* reference to *Annex I, paragraph 2(a) of the Rules of Procedures of the CLCS nor to the 1966 Geneva Agreement* (Good Offices Process of the UN Secretary-General ("*the land dominates the sea*")

Part 4: Submissions to the CLCS and reactions by neighboring States

Map showing the outer limit line for the continental shelf of **Guyana**

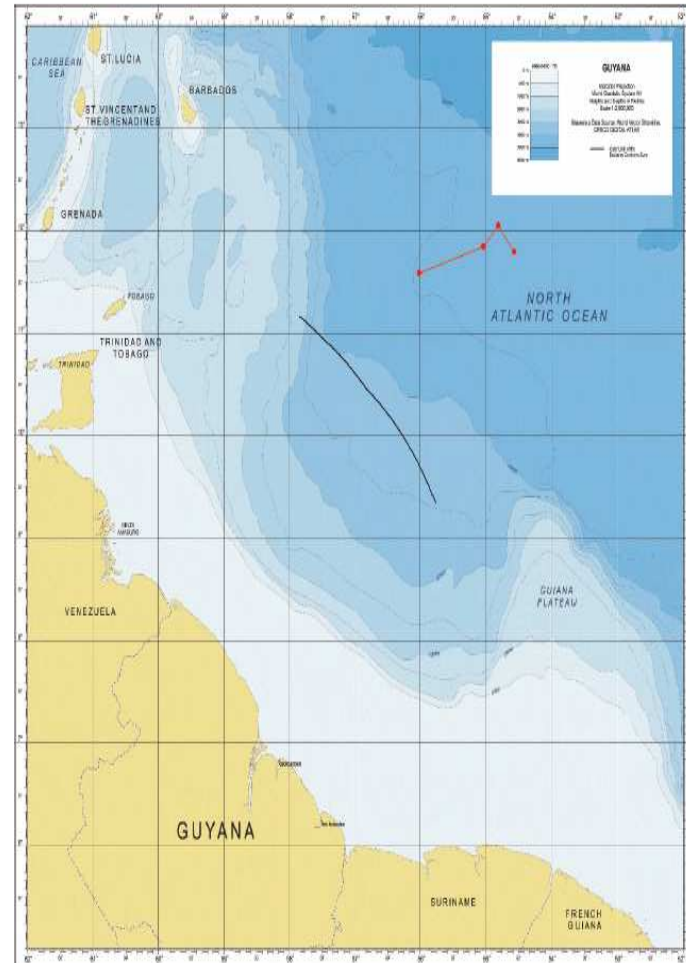


Figure 1. The outer limits of the continental shelf of the Co-operative Republic of Guyana (red line) beyond 200 nautical miles (black line) measured from the baselines from which the breadth of the territorial sea is measured according to paragraph 7 by straight lines not exceeding 60 nautical miles in length, connecting fixed points, defined by coordinates of latitude and longitude.

Source: Government of the Co-operative Republic of Guyana, Executive Summary, a submission of data and information on the outer limits of the continental shelf of the Co-operative Republic of Guyana pursuant to Part VI of and Annex II to the United Nations Convention on the Law of the Sea, Part I, Submission to the Commission on the Limits of the Continental shelf through the Secretary-General of the United Nations, 2009, p. 13.

Part 4: Submissions to the CLCS and reactions by neighboring States

Guyana's preliminary information: The line from points **OL-Guy-1** to **OL-Guy-2** cuts the line of **Trinidad and Tobago** between points **TT-FP23** and **TT-FP24** as well as the line of **Suriname** between **OL-SUR-17** and **OL-SUR-18**



- Barbados (Gardiner Formula)
- Trinidad and Tobago (350 M Constraint Line)
- Suriname (350 M Constraint Line)
- Guyana (?)

Part 4: Submissions to the CLCS and reactions by neighboring States

Guyana's preliminary information: The line from *OL-Guy-2* to *OL-Guy-3* cuts the line of *Barbados* between *FP2* and *FP3*



- Barbados (Gardiner Formula)
- Trinidad and Tobago (350 M Constraint Line)
- Suriname (350 M Constraint Line)
- Guyana (?)

Part 5: Role of the CLCS

- ▶ **Purpose:** Facilitate the implementation of UNCLOS in respect of the establishment of the outer limits of the continental shelf beyond 200 M
- ▶ **Functions:**
 - ▶ (a) To consider the data and other material submitted by coastal States concerning the ECS, and to make recommendations in accordance with Article 76, and;
 - ▶ (b) To provide scientific and technical advice, if requested by the coastal State concerned during preparation of such data (Art. 3, Annex II, UNCLOS)
- ▶ The actions of the CLCS **shall not** prejudice matters relating to **delimitation of boundaries** between States with opposite or adjacent coasts (Art. 9, Annex II, UNCLOS)

Part 5: Role of the CLCS

The Northeastern part of South America facing the Atlantic Ocean before the CLCS

- ▶ As recognized by all States in the region, there is an area in the Atlantic Ocean, *off the Northeast shoulder of South America*, where the *extended continental shelf claims of Barbados, Guyana, Suriname, Trinidad and Tobago and Venezuela, converge and overlap*
- ▶ There are currently some outstanding questions remaining in relation to *bilateral delimitation* of the continental shelf in that area, which should be taken into account when examining the submissions made by Barbados, Suriname, Trinidad and Tobago and Guyana (once completed for the latter)

Part 6: Conclusions

- ▶ The competence with respect to matters regarding the ***delimitation*** of their respective continental shelves among States claiming overlapping ECS, ***rests with those States*** (CLCS/40/REV. 1, Annex I, paragraph 1)
- ▶ In cases where a land or maritime dispute exists, ***the CLCS should not consider and qualify a submission made by any of the States concerned in the dispute.*** However, the CLCS may consider one or more submissions in the areas under dispute with prior consent given by all States that are parties to such a dispute (CLCS/40/REV. 1, Annex I, paragraph 5(a))
- ▶ The CLCS may request a State making a submission to ***cooperate*** with it in order not to prejudice matters relating to the ***delimitation of boundaries*** between opposite or adjacent States (CLCS/40/REV. 1, Annex I, paragraph 6)

Questions



ARBITRAL AWARDS OF 2006 AND 2007		Positions	Description of the area (from the geological and geomorphological point of view)	Jurisdiction to delimit the ECS	Consideration of geological and geomorphological factors (concept of natural prolongation/test of appurtenance)	Consideration of delimitations already made or still to be made in the region
PARTIES	Barbados	SMB (EEZ+CS) No ECS (a. International community and b. Venezuela as neighbor)				
	Trinidad and Tobago	EEZ+ECS				
AWARD			Barbados: No part of the Windward Islands but sited east of them T&T: Extension of the Andean range	Yes (but no jurisdiction to delimit between the Parties and any third State) <u>St. Pierre & Miquelon</u> : Not between a third State but the international community (CLCS)	No (only geography)	No -Partially the 1990 Agreement (Vzla-T&T) -1966 Geneva Agreement -Pending arbitration (Guyana-Suriname) <u>Guinea/Guinea-Bissau</u> : Need to take them into account to produce an "equitable result"
PARTIES	Guyana	SMB (EEZ+CS) No reference to 1966 Geneva Agreement				
	Suriname	SMB (EEZ+CS)				
AWARD			Similar	No (Tribunal not invited to delimit the ECS)	No (no need) Parties agreed they were of no relevance to the case	

SUBMISSIONS TO THE CLCS	Description of the ECS (geological and geomorphological + natural prolongation and test of appurtenance)	Relevant provisions of Article 76 UNCLOS	Outer limits of the ECS	Absence of disputes	Overlapping for an ECS	Reaction by neighboring States
Barbados	No	Gardiner formula (with the exception of two points)	<ul style="list-style-type: none"> -Northern Area: 9 points -Southern Area: 6 points -Total: 15 points 	<ul style="list-style-type: none"> -No reference to Annex I, para. 2(a) of the Rules of Procedure of the CLCS -Did not consult with Venezuela (despite para. 266 of its Reply) 	Yes	<ul style="list-style-type: none"> Yes -Suriname -T&T -Venezuela
Suriname	Yes	<ul style="list-style-type: none"> -Gardiner formula -350 M constraint line 	<ul style="list-style-type: none"> -Gardiner formula: 5 points (east) -350 M constraint line: 14 points (west) -Total: 19 points 	<ul style="list-style-type: none"> -Reference to Annex I, para. 2(a) of the Rules of Procedure of the CLCS -Consulted with neighbors 	Yes	<ul style="list-style-type: none"> Yes -France -T&T -Barbados
Trinidad and Tobago	Yes	<ul style="list-style-type: none"> -Gardiner formula -350 M constraint line -2,500 m + 100 M constraint line 	<ul style="list-style-type: none"> -Gardiner formula: 2 points (northeast) -350 M constraint line: 27 points -2,500+100 M: 162 points (southwest) -Total: 191 points 	<ul style="list-style-type: none"> -Reference to Annex I, para. 2(a) of the Rules of Procedure of the CLCS -Consulted with neighbors 	Yes	<ul style="list-style-type: none"> Yes -Suriname
Guyana	Yes	<ul style="list-style-type: none"> -Gardiner formula -Hedberg formula -350 M constraint line 	<ul style="list-style-type: none"> -Formulae lines: ? -350 M constraint line: ? -Total: 4 points 	<ul style="list-style-type: none"> -No reference to Annex I, para. 2(a) of the Rules of Procedure of the CLCS -No reference to the 1966 Geneva Agreement 	Yes	No