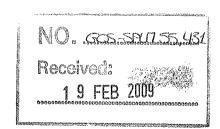
## WILMER CUTLER PICKERING HALE AND DORR LLP

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18 February 2009

Permanent Court of Arbitration Attn: Judith Levine Peace Palace Carnegieplein 2 2517 KJ The Hague The Netherlands



Dear Ms. Levine

## PCA No. GOS-SPLM 53,391 The Government of Sudan vs. The Sudanese People's Liberation Movement

Please see enclosed five copies of the Sudan People's Liberation Movement/Army Reply Memorial Map Atlas.

Please note that there was an error in the page numbering of the Expert Report of Dr. Peter Poole. Please replace the existing pages 29 and 32 of the Ngok Dinka Abyei Community Mapping Project - Expert Report of Peter Poole with the new pages 29 and 30 enclosed herein.

Yours faithfully

Gary Born Wendy Miles

Encls.

## 6. CONCLUSION

I directly observed that that the Ngok Dinka, in particular their chiefs and elders, have an intimate and impressive knowledge of their ancestral lands as they were in 1905. In particular, they understand the manner in which their ancestors lived in those lands and used the natural resources that those lands contained.

I am advised and observed the Ngok Dinka have a strong oral history. From interviews with chiefs and elders in community meetings, as well as one-on-one interviews during the field visits, the use of oral history to understand the tribe's connection to the land was obvious to me. The Abyei Mapping Team documented the collective group's knowledge of Ngok historic connection to their lands, and in particular to the Study Area in their log books, with their GPS units, and using video footage and photographs.

The Abyei Mapping Team mastered the GPS units quickly and diligently. They paid close attention to record accurately, methodically, and consistently their findings. While not an exhaustive representation of all of the Ngok Dinka landmarks of 1905, the Abyei Mapping Team gathered data about a significant number of important places. In light of the limited time frame, emphasis was placed on permanent settlements and gathering additional information about how else particular sites were used (i.e., for grazing, initiations, cultivation, fishing etc.).

There were significant time and other constraints on this project. As indicated, I would expect this type of project to take about a year. For this reason, we started from the premise that we could not feasibly record and map all Ngok landmarks, and instead concentrated on the Study Area. The combination of environmental factors (i.e. swollen rivers), limited infrastructure (i.e. lack of roads and bridges), and safety concerns (i.e. militia, Government controlled checkpoints and armed Misseriya) made it impossible to fully map even the Study Area, much less to create a map of the entire Abyei Area.

Nevertheless, based on the information collected, the Abyei Mapping Team's data records a considerable number of Ngok Dinka landmarks. Their efforts have resulted in the production of a map of Ngok landmarks within the general vicinity around and to the north of Abyei town. The data that was collected by the Abyei Mapping Team is of a quality and type that I would expect from a project of this nature and complexity. I am confident that the methodology was implemented appropriately and carried out effectively. In my opinion, the Abyei Mapping Team's results are sound and reliable.

The fact that most of the data is from areas accessible by motor vehicle is consistent with the fact that time did not permit extensive coverage of the land by foot, which would have been the ordinary method of transportation of the Ngok Dinka ca. 1905. Whilst the data set is not complete, it is fair representation of Ngok Dinka landmarks in 1905 and consistent with the type of data obtained working with groups on similar projects.

I confirm that the facts stated in this report and the opinions expressed represent my true and complete professional opinion.

Signed:

Peter Poole

Hudson, Quebec

Date:

...... February 2009