



Will H. Cai  
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February 10, 2023

**VIA EDGAR**

U.S. Securities and Exchange Commission  
Division of Corporation Finance  
Office of Technology  
100 F Street, N.E.  
Washington, D.C. 20549

Attn: Ms. Melissa Walsh, Senior Staff Accountant  
Mr. Stephen Krikorian, Accounting Branch Chief  
Ms. Kyle Wiley, Staff Attorney  
Mr. Larry Spirgel, Office Chief

Re: **Bitdeer Technologies Group**  
**Responses to Staff's Comments on Amendment No. 10 to Draft Registration Statement on**  
**Form F-4 Submitted on February 3, 2023**  
**CIK No. 0001899123**

Ladies and Gentlemen:

On behalf of our client, Bitdeer Technologies Group (the "**Company**"), we are responding to the comments of the staff (the "**Staff**") of the Securities and Exchange Commission (the "**Commission**") contained in the letter dated February 8, 2023 (the "**Comment Letter**"), relating to the above referenced Amendment No. 10 to Draft Registration Statement on Form F-4 (the "**DRS/A**"). In response to the comments set forth in the Comment Letter, the Company has revised the DRS/A and is filing a revised version of the DRS/A (the "**Revised DRS/A**") via EDGAR with this response letter.

The Staff's comments are repeated thereafter in bold and are followed by the Company's responses. Page references in the text of this response letter correspond to the page numbers of the Revised DRS/A. Capitalized terms used but not defined herein are used herein as defined in the Revised DRS/A.

**Amendment No. 10 to Draft Registration Statement on Form F-4**

**Information Related to Bitdeer**

**Energy, page 212**

- We note your response to prior comment 5 and reissue it, in part. In light of the importance of energy to your operations, please provide detail about the production of energy used at your mining datacenters. For example, discuss whether the power suppliers at each of your datacenters are coal-fired plants or hydroelectric facilities.**

In response to the Staff's comment, the Company has revised the disclosure on pages 211 and 212 of the Revised DRS/A.

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**Bitdeer’s Directors and Executive Officers, page 215**

2. **Update your total compensation paid and benefits in-kind provided to your directors and executive officers for the year ended December 31, 2022.**

In response to the Staff’s comment, the Company has revised the disclosure on page 215 of the Revised DRS/A.

**Bitdeer Technologies Holding Company and Subsidiaries**

**Notes to the Unaudited Condensed Consolidated Financial Statements**

**Note 20. Related Party Transactions, page F-58**

3. **We continue to consider your responses to comment 3 in your letter dated September 6, 2022, to comments 2 and 3 in your letter dated November 3, 2022, and to comment 7 in your letter dated November 23, 2022, in addition to your letter dated December 21, 2022, regarding your accounting for cryptocurrency lending transactions and wealth management products and may have further comment.**

The Company acknowledges the Staff’s comment.

**General**

4. **We note mention of Genesis Mining and Power Mining Pool on page 80 in your filing. Please disclose whether you or Matrixport have any direct or indirect relationship with either company.**

In response to the Staff’s comment, the Company has revised the disclosure on page 80 of the Revised DRS/A.

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If you have any questions regarding the response letter, please contact the undersigned by phone at +852-3758-1210 or via e-mail at [wcai@cooley.com](mailto:wcai@cooley.com).

Very truly yours,

/s/ Will H. Cai

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Will H. Cai

cc:     Linghui Kong, Chief Executive Officer, Bitdeer Technologies Holding Company  
        Naphat Sirimongkolkasem, Chief Financial Officer, Blue Safari Acquisition Corp.  
        Nicholas H.R. Dumont, Esq., Partner, Cooley LLP  
        Timothy Pitrelli, Esq., Partner, Cooley LLP  
        Danielle Bian, Partner, MaloneBailey, LLP  
        David Grossman, Partner, Marcum LLP  
        Derek Dostal, Esq., Partner, Davis Polk & Wardwell LLP  
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