

March 16, 2023

Linghui Kong
Chief Executive Officer
Bitdeer Technologies Group
08 Kallang Avenue
Aperia Tower 1, #09-03/04
Singapore 339509

Technologies Group
Statement on Form F-4

Re: Bitdeer
Registration
Filed March 8, 2023
File No. 333-270345

Dear Linghui Kong:

We have reviewed your registration statement and have the following comments. In some of our comments, we may ask you to provide us with information so we may better understand your disclosure.

Please respond to this letter by amending your registration statement and providing the requested information. If you do not believe our comments apply to your facts and circumstances or do not believe an amendment is appropriate, please tell us why in your response.

After reviewing any amendment to your registration statement and the information you provide in response to these comments, we may have additional comments.

Registration Statement on Form F-4 filed March 8, 2023

BSGA's Board's Review of Valuation, page 135

1. We note your non-reliance on your outdated projections and your consideration of certain selected financial information to support a revised valuation of Bitdeer. In this regard, explain how the significant drop in the valuation of Bitdeer (\$4.5 billion reduced to \$1.18 billion) provided the Board an "adequate basis" to support consummation of the merger.

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BSGA's Management's Discussion and Analysis of Financial Condition and Results of
of
Operation, page 190

2. Please revise to update the discussion indicating that you have not selected any specific business combination target.

Critical Accounting Policies
Net Income per Common Share, page 194

3. Please revise to explain how the estimation uncertainties impact your computation of net loss per share.

Bitdeer's Management's Discussion and Analysis of Financial Condition and Results of
Operation, page 220

4. We note the selected unaudited financial information for the year

ended December 31,
2022 disclosed on page 142. Tell us what consideration you gave to
discussing and
analyzing your preliminary results, with disclosure addressing whether
such results reflect
trends consistent with your historical results, and why only
preliminary financial
information is available. Also consider disclosing such information in
the forefront of the
filing.
Experts, page 272

5. We note that you have also included audited financial statements of
Blue Safari Group
Acquisition Corp. as of December 31, 2022. Revise to update the
disclosure regarding the
statement of experts. Refer to Item 10.G of Form 20-F.
Annex D: Valuation Reports of Royson Valuation Advisory Limited, page D-1

6. Please include Royson's updated Valuation Report supporting the
revised valuation of
Bitdeer.
Exhibit 99.10, page II-2

7. The representation included as Exhibit 99.10 indicates that the
registration statement on
Form F-4 relates to the proposed initial public offering in the United
States of the
Company's ordinary shares to be represented by American depository
shares in
connection with the business combination. However, we note that,
pursuant to the Third
Amendment, the parties agreed to remove the American Depository Share
structure
previously contemplated under the Second Amended Merger Agreement and
instead issue
ordinary shares of BTG as considerations to be paid. Please revise the
description of the
registration statement in your representation, accordingly.

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We remind you that the company and its management are responsible for
the accuracy
and adequacy of their disclosures, notwithstanding any review, comments, action
or absence of
action by the staff.

Refer to Rules 460 and 461 regarding requests for acceleration. Please
allow adequate
time for us to review any amendment prior to the requested effective date of
the registration
statement.

You may contact Melissa Walsh, Senior Staff Accountant, at (202)
551-3224 or Stephen
Krikorian, Accounting Branch Chief, at (202) 551-3488 if you have questions
regarding
comments on the financial statements and related matters. Please contact Kyle
Wiley, Staff
Attorney, at (202) 344-5791 or Larry Spigel, Office Chief, at (202) 551-3815
with any other
questions.

Sincerely,

Division of

Office of Technology

Corporation Finance

cc: Will Cai