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July 28, 2015

BY POST AND BY FACSIMILE

OTC Markets Group Inc.
304 Hudson Street, 3rd Floor
New York, NY 10013

Re: Borealis Exploration Limited

Ladies and Gentlemen:

I am counsel to Borealis Exploration Limited (the "Company"). I have provided this letter (this "Letter") to you for determining whether the Company has made adequate current information publicly available within the meaning of Rule 144(c)(2) under the Securities Act of 1933, as amended (the "Securities Act"). You may rely upon this Letter for the foregoing purpose and the transactions contemplated hereby. No other person or party may rely on this Letter without my express written consent in each instance.

I am resident in the United States, am licensed to practice law in the States of New Jersey and New York and am permitted to practice before the Securities and Exchange Commission ("SEC") and have not been prohibited from practice thereunder. I have been specifically retained by the Company for the purpose of preparing and delivering this Letter to you. I have served as general counsel to the Company since 2005.

I have examined such corporate records and other documents and such questions of law as I have considered necessary or appropriate for the purposes of rendering this Letter. With respect to factual matters relevant to this Letter, I have relied on publicly available information from Companies House in Gibraltar and information obtained from the Company's officers and directors. I have also reviewed the following documents posted at www.OTCMarkets.com and publicly available through the OTC Disclosure and News Service in connection with the preparation of this Letter: (i) the Company's Initial Information and Disclosure Statement posted on July [], 2015; (ii) the Company's audited and unaudited financial statements for the periods ended March 31, 2014 through March 31, 2015 posted on July [], 2015; (iii) the Company's Memorandum and Articles of Association; and (iv) the information under the heading "Corporate Information" on the Company's website (www.borealis.gi) (collectively, the "Information").

The Letter relates to the laws of the United States, specifically the Securities Act. The Company is not a reporting issuer under the Securities Exchange Act of 1934, as amended ("Exchange Act"), and, therefore, does not file periodic reports with the SEC.

Based on and subject to the foregoing, I am of the opinion that the Information:

(i) constitutes adequate current public information concerning the Company and its securities;
(ii) is available within the meaning of Rule 144(c)(2) under the Securities Act;
(iii) includes all of the information that a broker-dealer would be required to obtain from the Company to publish a quotation for the securities under Rule 15c2-11 under the Exchange Act;
(iv) complies as to form with the OTC Market's Guidelines for Providing Adequate Current Information, which are located on the Internet at www.OTCMarkets.com; and
(v) has been posted through the OTC Disclosure and News Service.

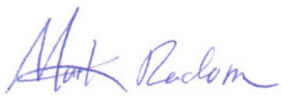
The person responsible for the preparation of the Company's financial statements is Moshe Cohen and the annual financial statements are audited by Moore Stephens, which is located at Suite 5, Watergardens 4, Waterport, Gibraltar. Moshe Cohen is a South African chartered accountant and an Israeli-qualified certified public accountant, which, in both cases, is the equivalent of a United States certified public accountant. Mr. Cohen also has prepared financial statements for US-publicly traded companies. The Company's transfer agent is OTR Transfer Inc. ("OTR"). OTR is located at Congress Center, 1001 SW 5th Ave #1550, Portland, OR 97204, United States and is registered with the SEC. In order to confirm the number of outstanding shares of common stock of the Company, I received a list of registered shareholders, which includes the number of shares outstanding, from OTR.

I have (i) personally met with management and a majority of the directors of the Company, (ii) reviewed the Information, as amended, published by the Company through the OTC Disclosure &News Service and (iii) discussed the Information with management and a majority of the directors of the Company.

To the best knowledge of counsel, after inquiry of management and the directors of the Company, none of the Company, any 5% holder, or counsel is currently under investigation by any federal or state regulatory authority for any violation of federal or states securities laws.

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Sincerely yours,



Mark Radom, Esq.