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May 17, 2017

OTC Markets Group, Inc.
304 Hudson Street
2nd Floor
New York, NY 10013

RE: Pilgrim Petroleum Corp. [PGPM]

The Bunker Law Group, PLLC (“Counsel”), with its principal offices at 3753 Howard Hughes Parkway, Suite 200, Las Vegas, NV 89169, serves as special counsel to Pilgrim Petroleum Corp., PGPM (hereinafter the “Company”) and has been retained by the Company for the purposes of posting this letter on the OTC Disclosure and News Service. Pink OTC is entitled to rely upon this letter in determining whether the Company has made adequate current information publicly available within the meaning of Rule 144(c)(2) of the Securities Act of 1933.

Counsel serves as regular securities counsel to the Company. The undersigned attorney is a resident of the United States of America and has been retained by the Company to render this letter and for other matters as well. The undersigned attorney is licensed to practice law in the highest court in the state of Nevada and this letter covers the jurisdiction of the state of Nevada as well as the applicable laws of the United States of America. The undersigned attorney is permitted to practice before the Securities and Exchange Commission and has not been prohibited from practice thereunder.

The OTC Markets Group, Inc. (“OTCMG”) is entitled to rely upon the contents of this letter solely for the purpose of 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 “Act”). OTCMG has full and complete permission and rights to publish this letter with OTC Disclosure and News Service for viewing by the general public and regulators, and OTCMG may rely upon this opinion in determining whether the Company has made adequate current information publicly available within the meaning of Rule 144(c)(2) of the Act without the prior written consent of Counsel. However, this opinion may not be quoted to, furnished to, or relied upon, by any other person, including, without limitation, public investors making their investment decisions, without the prior written consent of Counsel.

In rendering this letter, we have examined the Company’s corporate minutes and actions of the Company’s Board of Directors and its Shareholders, its Certificate of Incorporation (and any amendments thereto), and its Bylaws (collectively, “the Corporate Documents”) and such other documents as deemed necessary or appropriate for purposes of rendering this letter.

We have reviewed the following report posted on May 15, 2017; the Company’s Annual Disclosure. It is my opinion that said documents are accurate, up to date and contains the most current information available on the Issuer.



In rendering this letter, Counsel has personally met with management and with all of the Directors of the Company, has reviewed the Statement published by the Company and personally discussed the Statement with management and all of the Directors of the Company.

In our opinion, the Annual Report constitutes adequate current information that is publicly available within the meaning of Rule 144(c)(2) under the Securities Act of 1933 as a result of such Annual Report being posted on the OTC Disclosure and News Service on May 15, 2017, and that the Annual Report includes all of the information that a broker-dealer would be required to obtain from the Company to publish a quotation for all of the Securities of the Company under Rule 15c2-11 under the Securities and Exchange Act of 1934, and that the Annual Report complies as to form with the OTC Pink Basic Disclosure Guidelines.

The party responsible for the preparation of the financial statements is: Bryan Bulloch, Partner at Bulloch, Brown, DuPertuis, Seger & Co., P.C., 17101 Preston Rd, Suite 210, Dallas, TX 75248 (office number 972-381-1272). Bryan Bulloch has a B.B.A. in Accounting and a Masters of Taxation and is a CPA licensed in the state of TX. The financial statements are unaudited.

The Company's transfer agent is Securities Transfer Corporation, located at 2901 Dallas Pkwy, Ste 380, Plano, TX 75093, which is a registered transfer agent with the Securities and Exchange Commission. Counsel confirmed the outstanding shares set forth in its Annual Report by personally contacting the transfer agent at the transfer agent's office, on May 15, 2017.

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

Moreover, the only executive officer/director who provided information related to the disclosure (the Annual Report) was the Company's President, Rafael Pinedo. Mr. Pinedo's information is as follows: 5057 Keller Springs Rd, Suite 300, Addison, TX 75001. Mr. Pinedo holds 19,500 preferred shares, the result of payment of capital only and are restricted.

Counsel has made specific inquiry of the persons above, persons engaged in promotional activities regarding the Company, if any, and persons owning more than ten-percent (10%) of the Securities (collectively, the "Insiders"), and based upon such inquiries and other information available to counsel, any sales of the Securities by Insiders within the twelve-month period prior to the opinion have been made in compliance with Rule 144, including, without limitation, any required filings of Form 144, and nothing has come to the attention of counsel indicating that any of the Insiders is in possession of any material non-public information regarding the Company or the Securities that would prohibit any of them from buying or selling the Securities under Rules 10b-5 or 10b5-1 under the Exchange Act.

To the best knowledge of this firm, after inquiry of management and the Directors of the Company, neither the Company nor any 5% holder, or the undersigned attorney, is currently

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under investigation by any Federal or state regulatory authority for any violation of Federal or state securities laws.

Sincerely,

/s/ Benjamin L. Bunker

BENJAMIN L. BUNKER, ESQ.

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