FORM 51-102F3
MATERIAL CHANGE REPORT

Item 1: Name and Address of Company

Surge Copper Corp.
#888 – 700 West Georgia Street
Vancouver, B.C. V7Y 1G5
Telephone: 604-718-5454
Facsimile: 604-662-3791

Item 2: Date of Material Change

May 7, 2020

Item 3: News Release

The news release was disseminated on May 7, 2020 through Stockwatch and filed on SEDAR.

Item 4: Summary of Material Change

SURGE COPPER ANNOUNCES A $200,000 NON-BROKERED PRIVATE PLACEMENT

Item 5: Full Description of Material Change

Surge Copper Corp. (the "Company" or "Surge Copper") (TSX-V:SURG), announces a non-brokered private placement offering of up to 3,333,333 units ("Units") at a price of $0.06 per Unit to raise gross proceeds of $200,000. Each Unit is comprised of one common share and one share purchase warrant. Each warrant will entitle the holder to acquire an additional common share of the Company at an exercise price of $0.09 per share for a period of three years from the closing date of the private placement.

In conjunction with this financing, the Company may pay a finder's fee to eligible persons in compliance with applicable securities laws and exchange policies. This financing is subject to TSX Venture Exchange approval. The proceeds of the private placement will be used for general working capital.

The Company is currently evaluating opportunities to continue to explore and advance the highly prospective Ootsa Property located adjacent to the Huckleberry Mine in west central British Columbia. The last exploration program at Ootsa in 2018 achieved the following successes (previously released):

A 50 metre step out on the East Seel deposit returned 138 metres grading 0.31% copper and 0.37 g/t gold, including 52 metres grading 0.42% copper and 0.47 g/t gold (hole S18-211).
A new discovery outside of the current resource area intersected 22 metres grading 1% copper, 0.19 g/t gold, and 35.3 g/t silver within a larger interval grading 0.5% copper, 0.1 g/t gold, and 17.6 g/t silver over 50 metres (hole S18-214).

Hole S18-217 intersected 9.4 g/t gold over 2 metres at 130 depth in a new discovery along an extensional fault zone which has an inferred strike length exceeding 3 kilometres.

The Ootsa Property is fully permitted, has an exploration camp on site, and contains excellent road access in addition to a network of secondary roads providing access to large portions of the property. This infrastructure allows for low cost all-weather exploration.

Item 6: Reliance on subsection 71(2) of National Instrument 51-102

N/A

Item 7: Omitted Information

N/A

Item 8: Executive Officer

The following executive officer of the Company is knowledgeable about the material change disclosed in this report and may be contacted as follows:

Shane Ebert
President & CEO
Telephone: 604-718-5454

Item 9: Date of Report

May 7, 2020