



Comstock Metals Ltd.

**Form 51-102F1
Management's Discussion and Analysis
For the Six Month Period Ended March 31, 2018
Expressed in Canadian Dollars Unless Otherwise Noted**

This Management Discussion and Analysis ("MD&A"), dated as of May 28, 2018, should be read in conjunction with condensed consolidated interim financial statements for the six months ended March 31, 2018 of Comstock Metals Ltd. (also referred to as "Comstock" or the "Company", or "we" or "our") and other corporate filings available under Comstock's company profile on SEDAR at www.sedar.com and the Company's website, www.comstock-metals.com. We report our financial position, results of operations and cash flows in accordance with International Financial Reporting Standards ("IFRS") as issued by the International Accounting Standards Board.

Overview and Overall Performance

Comstock Metals is primarily a gold exploration company with its shares traded on the TSX Venture Exchange under the symbol "CSL" as well as trading on the OTC under symbol "CMMMMF". Comstock is led by a technically focused management team engaged in the acquisition and exploration of projects in mining friendly jurisdictions. Comstock is currently engaged in the exploration and development of mineral properties in the White Gold District of the Yukon, as well as the La Ronge Gold Belt in Saskatchewan. The Company has also recently optioned its first cobalt exploration property, see subsequent events hereafter. For the funding of property acquisitions and exploration the Company currently depends on the issuance of shares from the treasury to investors. The head office, registered office, principal address and records office of the Company are located at 850 West Hastings Street, Suite 310, Vancouver, British Columbia, Canada, V6C 1E1.

As of March 31, 2018, the Company has working capital of \$836,492 (September 30, 2017 - \$1,061,632) and cash on hand of \$873,008 (September 30, 2017 - \$1,404,586). As of the date of this report, the Company had not advanced its properties to commercial production and is not able to finance day to day activities through operations. The Company's continuation as a going concern is dependent upon the successful results from its mineral property exploration activities and its ability to attain profitable operations and generate funds there from and/or raise equity capital or borrowings sufficient to meet current and future obligations. These factors indicate the existence of a material uncertainty that may cast significant doubt about the Company's ability to continue as a going concern. Management intends to finance operating costs over the next twelve months with cash on hand, loans from directors and companies controlled by directors and or private placement of common shares.

QV Gold Project, Yukon

One of Comstock's focus projects is the QV property, which covers 16,031 hectares (40,000 acres) within the White Gold District in the Yukon Territory, about 70 kilometres south of Dawson City (the "QV Property"). The QV Property is contiguous to White Gold Corp's White Gold project and hosts a similar style mineralization to the Golden Saddle deposit.

Comstock optioned the original QV Property in 2010 from Shawn Ryan, a Yukon-based prospector responsible for the initial identification of two of the prominent gold discoveries in the White Gold District, White Gold's +1.0 million ounce Golden Saddle deposit on its White Gold project, 10 km to the south, Goldcorp Inc's +5.0 million ounce Coffee project 40 km to the south. The Company earned a 100% interest in the QV Property in 2014 by making staged cash and share payments and completing exploration expenditures.

The QV Property is subject to a 2.0% Net Smelter Royalty ("NSR") in favour of the optionor. The Company has the right to acquire 1.0% of the NSR for a payment of \$2,500,000. Commencing June 22, 2015, the Company must also make annual cash advance payments of \$25,000 to the optionor until the commencement of commercial production (the "Advance Royalty"). The Advance Royalty is deductible against the NSR.

The Company may pay the Advance Royalty in cash or by issuing common stock of the Company based on the average closing price of its shares in the 10 trading days prior to the due date of the Advance Royalty. As of June 22, 2017, the Company and optionor agreed to settle the \$25,000 Advance Royalty owed as of June 22, 2017 for 156,250 common shares of the Company. This is recorded as an obligation to issue shares on the Company's consolidated statements of financial position as of June 30, 2017. On July 14, 2017, the Company received TSX Venture Exchange approval to issue 156,250 shares to satisfy the \$25,000 owing from June 22, 2017. The common shares issued in satisfaction of the indebtedness were subject to a four month hold period from the date of issuance.

2010-2013 QV Exploration Work

Exploration by Comstock between the time of its acquisition of the QV Property in 2010 and 2013 consisted of the collection of 8,161 ridge and spur and grid soil samples, prospecting and geological mapping with coincident geochemical sampling, a 773 line kilometre airborne magnetic and radiometric geophysical survey, ground magnetic surveys and 32 induced polarization lines over the VG, Stewart and Shadow zones located in the QV Property, 3,570m of small excavator trenching in 28 trenches, 3,005m of direct push and geoprobe sampling on the QV Property, Stewart and Shadow grids, an aerial drone survey over the VG zone, and 3,419m of diamond drilling in 17 holes on the VG zone.

Visible gold was initially discovered on the southern QV Property by Comstock on June 10, 2012 while conducting follow up prospecting of a gold in soil anomaly; an initial grab sample returned 16.28 g/t Au and 47 g/t Ag with anomalous bismuth, tellurium, mercury, molybdenum and lead. The VG zone consists of quartz ±carbonate veins, stockwork and breccia zones, as well as pyrite veinlets, including cubic pyrite and visible gold, associated with intense-quartz-carbonate-sericite (or possible illite) alteration, with albite, pervasive K-spar and hematite. Overall gold is associated with anomalous silver, mercury, bismuth, tellurium, molybdenum, antimony, and barium. This style of mineralization and alteration is analogous to that at the Golden Saddle deposit on the White Gold Project.

Trenching on the VG zone in 2012 delineated a 450m by 65m, 250° trending zone of gold mineralization. Trench results (reported as length along the trench, not true widths) include 3.52 g/t Au over 80m from QVTR12-6, 1.63 g/t Au over 95m from QVTR12-12, and 2.18 g/t Au over 85m from QVTR12-13. Drilling on the VG zone intersected true widths of 2.23 g/t Au over 42m in QV12-004, 1.45 g/t Au over 60m in DDH QV12-6, 1.03 g/t Au over 78m in DDH QV12-1, including 6.15 g/t Au over 5.6m, 1.36 g/t Au over 42.6m in DDH QV13-11 (275m down dip of the mineralized zone in the discovery trench, QVTR12-6), and 1.76 g/t Au over 42.3m in DDH QV13-12 (at the open ended western limit of the zone).

The drill program delineated an open ended 250°/20-30°N trending, near surface tabular body of gold mineralization at the VG zone with a strike extent of 325m, traced up to 275m down dip from surface, and averaging 35-40m true thickness. Mineralization remained open to the west, down dip and beneath the mafic hornblende gneiss to the east and further exploration and infill drilling was recommended with the most favorable drill orientation at 160°/- 60 to -70°.

Mineralization at the VG zone occurs as stacked or en-echelon lenses hosted along WSW, gently NNW dipping sheared zones (average orientation of 250°/20°N), which are common throughout the southern part of the QV property. The shear zones occur as one or more stacked and intersecting horizons. Subsequent brittle reactivation of these shallowly north-northwest dipping structures has included local fracturing of the adjacent felsic rocks, which has permitted the flow of hydrothermal fluid that caused sericite (illite) - pyrite alteration of the adjacent wallrock, and local gold mineralization. The primary host rock is biotite-feldspar(±augen)-quartz gneiss, which occurs structurally below a hornblende-biotite-feldspar-quartz gneiss.

The original soil anomaly over the VG zone on the QV Property grid consisted of a 2 km long (with a 500m gap through the hornblende gneiss unit) and up to 400m wide >10 ppb gold anomaly with maximum values of 395.6 ppb Au and 8.7 ppm Ag from a south facing slope, with better soil development than most of the property area. Infill soil sampling returned a maximum of 1277 ppb Au. At the VG zone and overall on the QV property anomalous gold in soils is associated with anomalous mercury, bismuth, tellurium, molybdenum, moderately high barium, antimony ±lead soil geochemistry.

Other significant mineralization on the QV Property grid includes the Pump, North Star adit, and GP2 zones which all appear to occur along 070°/steep south trending sinistral faults that offset the airborne magnetic high, similar to the sinistral fault that offsets the magnetic high at the Golden Saddle deposit of Kinross Gold Corporation. The VG zone occurs along the Telegraph Fault, the Pump zone and North Star adit zone along the Adit Fault, 600m south of the VG zone and the GP2 zone along the VG North Fault, 1.2 km north. The GP2 zone itself consists of a 2.16 g/t Au anomaly from bedrock along geoprobe line QVGP13-2.

At the Shadow zone (12 km north-northwest of the VG zone), two structures have been interpreted from magnetic data and surface mapping. Low grade gold mineralization (0.33 g/t Au over 85m, including 0.9 g/t Au over 10m) is hosted by felsic intrusive rocks, of probable Jurassic age, along the northwest trending Spirit Fault which corresponds to a 2.7 km long northwest trending gold in soil anomaly, open to the southeast. In addition, a 1.3 km long gold-in-soil anomaly, open to the northeast, parallels the ENE trending Shadow Fault (parallels the Telegraph Fault at the VG zone). Initial bedrock interface sampling on the structures include results of 1.5 and 0.90 g/t Au. A second, possibly structurally related, east-northeast trending gold-in-soil anomaly extends through untested soil highs of 504 and 249 ppb Au in the central grid area. Maximum soil values on the Shadow grid include 514 ppb Au, 2.6 ppm silver, 33.9 bismuth, 9.3 ppm tellurium, 316.4 ppm arsenic, and 60 ppm Mo.

The Stewart zone, 5 km north-northwest of the VG zone, covers a 1.5 km long gold-in-soil anomaly, with a maximum value of 274.1 ppb Au, and anomalous bismuth, silver and tellurium ±molybdenum. The gold-in-soil anomaly and low-grade mineralization uncovered to date (0.13 g/t Au over 40m and 0.10 g/t Au over 30m in QVTR12-17, 0.48 g/t Au from a pit along QVTR12-9, and 0.12 g/t Au over 65m with a maximum of 0.42 g/t Au in geoprobe sampling) are associated with a magnetic low, along the southern margin of an intrusion of probable Jurassic age. The intrusion on the Stewart grid resembles the intrusion at Shadow and both appear to be related to the mineralized K-spar porphyry sills within the VG zone. The Stewart intrusion corresponds to an airborne potassium high anomaly and a thorium/potassium low in the Precision airborne survey, the same signature which characterizes the Jurassic aged Ten and Jual stocks, located 30 km northwest of the Stewart grid, and 20 km north of Shadow.

On July 8, 2014, the Company announced a National Instrument ("NI") 43-101 compliant Inferred Mineral Resource of 230,000 ounces of gold (4.4 million tonnes at a grade of 1.65 g/t Au at a 0.5 g/t Au cut-off grade (COG)), at the VG zone, on its QV Property, White Gold District, Yukon Territory. The VG Zone remains open along strike and down dip and other targets exist on the QV Property with potential for intrusion-related or orogenic gold mineralization.

From the 17 diamond drill holes (DDH) completed in 2012 and 2013, 16 (3,278 m) were used to construct a 3D resource model for the VG Zone. The model is comprised of 3 sub-parallel, geology-guided grade shells (at a nominal COG of 0.4 g/t gold). Assays within these zones were capped at 7 g/t au and composited into 2-meter lengths for estimation by block model. A 20 meter (Easting), 20 meter (Northing) and 10 meter (Vertical) block model was constructed using commercially-available software (GEMS®). Grades for the blocks were estimated with Inverse Distance Squared (ID2) method using the modelled zones as hard boundaries. Density values for the model were assigned based on the average value from 63 density determinations carried out by Comstock using weight in air/weight in water method.

All reported Mineral Resources for the VG Zone are classified in the Inferred Mineral Resources category. To limit the reported estimate to material considered potentially minable by open pit mining, a resource constraining pit shell was constructed using a gold price of US\$1,300/ounce for gold, and cost and recovery assumptions used in previous NI 43-101 Technical Reports for the White Gold deposit 10 km to the south. Only the portions of the modeled zones at VG that fall within this pit are reported here as Mineral Resources at a COG of 0.5 g/t gold.

To demonstrate the relatively low sensitivity of the Inferred Mineral Resource estimate to changes in COG, tabulations at various COGs are listed below with the base case at a COG of 0.5 g/t gold highlighted.

VG Zone Inferred Mineral Resource Estimate at a 0.5 g/t Gold cut-off grade

Cut-off Grade Gold (g/t)	Tonnes	Gold Grade (g/t)	Contained Gold (Ounces)
0.3	4,480,000	1.62	230,000
0.4	4,420,000	1.64	230,000
0.5	4,390,000	1.65	230,000
0.6	4,340,000	1.66	230,000
0.8	3,970,000	1.75	220,000
1.0	3,520,000	1.86	210,000
1.2	2,990,000	1.99	190,000
1.5	2,210,000	2.22	160,000
2.0	1,130,000	2.72	100,000

The Technical Report (NI 43-101) was posted on SEDAR on August 21, 2014.

2016 Exploration Work

On July 12, 2016, the Company announced it had commenced a surface exploration program on the QV Project. The program was completed in early August and comprised 5.46 line km of IP/resistivity surveying at the VG, Shadow (12 km northwest of VG) and Stewart (5 km northeast of VG) targets, 359 GT Probe samples along 11 lines at the VG, Shadow and Stewart and a total of 451 soil samples collected at Shadow and Stewart. Results of these surveys were instrumental in refining drilling targets for the subsequent RAB drilling program. The size of the QV Property was also increased by staking an additional 31 quartz claims to partially fill an internal gap within the property.

On August 30, 2016, the Company announced it had commenced a 2,500 m rotary air blast (RAB) drilling program at the QV Property with an average planned hole depth in the 100 m to 150 m range. The RAB drill program was designed to inexpensively and rapidly screen numerous prospective targets within the QV Property for subsequent follow-up with a diamond drill program. The areas targeted for drilling included the VG deposit area, as well as the previously undrilled Shadow and Stewart targets. The program, which consisted of a total of 2,423.15 m of RAB drilling in 34 holes, was completed in mid-November and results were disclosed in news releases on October 13, 2016, November 8, 2016 and December 19, 2016. The RAB drilling program has successfully demonstrated that the QV Property deposit is open to expansion to the southwest and northeast, and, that further drilling on the Shadow and Stewart targets is required to evaluate their potential.

Highlights of the 2016 RAB drilling program at QV Property include:

- Potential new zone discovered 150-200 m south of main VG deposit (3.05 m averaging 7.79 g/t gold starting at 4.57 m below surface in 16QVRAB001, October 13, 2016 news release).
- VG zone extended 55 m east of hole QV13-013 by holes 16QVRAB011& 12 on the south side of the Telegraph fault (16.76 m averaging 1.43 g/t gold and 18.29 m averaging 1.81 g/t gold, respectively, both from surface; October 13, 2016 news release).
- VG mineralized zone extended at least 200 m to the northeast on the north side of the Telegraph fault, as evidenced by 16QVRAB006 (35.05 m averaging 0.46 g/t gold starting at 59.44 m below surface; October 13, 2016 news release) and 16QVRAB014 (10.67 m averaging 1.65 g/t gold starting at 16.76 m below surface in 16QVRAB014 within a wider interval of 64.01 m averaging 0.52 g/t gold; November 8, 2016 news release). Holes drilled in this area ended in mineralization and diamond drilling will be required to delineate the zone's thickness and grade characteristics.
- VG deposit expanded 100 m down dip of hole QV13-12 and 45 m west of holes QV12-06,-08 by holes 16QVRAB017 (12.19 m averaging 5.53 g/t gold starting at 83.82 m below surface in 16QVRAB017, within a wider interval of 57.91 m averaging 1.89 g/t gold; November 8, 2016 news release) and 16QVRAB018 (18.29 m averaging 1.14 g/t gold starting at 85.34 m below surface; November 8, 2016 news release). Both holes ended in mineralization and the VG zone remains open to expansion to the west in this area.
- Step out hole 16QVRAB024, drilled 750 m WSW along strike of VG deposit on an extension of the gold-in-soil anomaly, intersected 9.15 m averaging 0.326 g/t gold.
- Initial drilling along a 460 m section of the Spirit fault at the Shadow zone intersected anomalous gold in a number of holes including 16QVRAB029 with 9.14 m averaging 0.662 g/t gold starting at 53.34 m down hole and ending in mineralization; planned depth was only reached in 1 of the 7 holes drilled at Shadow due to high groundwater flow.
- Three holes completed from a single pad on the eastern side of the Stewart zone intersected widespread anomalous gold ranging up to 0.318 g/t.

Significant RAB drill results for all holes from the 2016 program are presented below in Table 1.

A total of 1752.58 m in 24 holes were completed at the VG zone, 399.29 m in 7 holes at the Shadow zone and 271.28 m in 3 holes at the Stewart zone. Drilling problems related to high groundwater flow and/or heavily fractured bedrock resulted in a number of holes not being completed to target depth; 22 holes were stopped prior to reaching 100 m and 13 holes did not reach 50 m.

Table 1: QV RAB Drilling Intercepts from 2016 Program*

Hole ID	Zone	From (m)	To(m)	Interval (m)**	Au (g/t)
16QVRAB001	VG South	4.57	7.62	3.05	7.79
16QVRAB006***	VG East	59.44	94.49	35.05	0.46
<i>Including</i>		<i>59.44</i>	<i>79.25</i>	<i>19.81</i>	<i>0.56</i>
<i>and</i>		<i>86.87</i>	<i>94.49</i>	<i>7.62</i>	<i>0.61</i>
16QVRAB011	VG East	0.00	16.76	16.76	1.43
<i>Including</i>		<i>0.00</i>	<i>6.10</i>	<i>6.10</i>	<i>3.65</i>
16QVRAB012	VG East	0.00	18.29	18.29	1.81
<i>Including</i>		<i>0.00</i>	<i>13.72</i>	<i>13.72</i>	<i>2.33</i>
16QVRAB013	VG East	38.10	39.62	1.52	1.41
16QVRAB014***	VG East	16.76	80.77	64.01	0.52
<i>including</i>		<i>16.76</i>	<i>56.39</i>	<i>39.62</i>	<i>0.74</i>
<i>including</i>		<i>16.76</i>	<i>27.43</i>	<i>10.67</i>	<i>1.65</i>
16QVRAB015***	VG East	35.05	39.62	4.57	1.03
16QVRAB016	VG East	0.00	24.38	24.38	0.18
16QVRAB017***	VG West	24.38	36.58	12.19	1.59
<i>and</i>		<i>56.39</i>	<i>114.30</i>	<i>57.91</i>	<i>1.89</i>
<i>including</i>		<i>83.82</i>	<i>103.63</i>	<i>19.81</i>	<i>4.19</i>
<i>including</i>		<i>83.82</i>	<i>96.01</i>	<i>12.19</i>	<i>5.53</i>
16QVRAB018***	VG West	36.58	41.15	4.57	0.99
<i>and</i>		<i>85.34</i>	<i>103.63</i>	<i>18.29</i>	<i>1.14</i>
16QVRAB019	VG West	7.62	13.72	6.10	0.21
16QVRAB022***	VG West	1.52	22.86	21.34	0.19
16QVRAB023	VG West	0.00	16.76	16.76	0.33
<i>including</i>		<i>1.52</i>	<i>7.62</i>	<i>6.10</i>	<i>0.60</i>
16QVRAB024	VG Far West	35.05	44.20	9.15	0.33
16QVRAB025	Shadow	38.10	53.34	15.24	0.23
16QVRAB027***	Shadow	4.57	24.38	19.81	0.20
16QVRAB028	Shadow	45.72	47.24	1.52	0.53
16QVRAB029***	Shadow	53.34	62.48	9.14	0.66
16QVRAB032	Stewart	60.96	124.97	64.01	0.103

*This table includes results disclosed in October 13, 2016, November 8, 2016, and December 19, 2016 news releases

**Insufficient information is available to estimate the true thickness of these intercepts and, as such, the true thickness may be less than the down-hole length intercept reported above.

***Hole ended in mineralization

Holes 16QVRAB001-004 were drilled approximately 150-200 m south of the main VG zone to investigate combined soil-GT Probe and resistivity anomalies. Further work is required to determine the significance of, and controls to, the 3.05 m at 7.79 g/t gold intersected starting at 4.57 m down hole in 16QVRAB001. This intercept is located considerably south of the VG zone proper and may represent a parallel mineralized structure. Results for RAB holes 16QVRAB002-4 included numerous anomalous samples of up to 0.412 g/t gold over 1.52 m, all associated with broad (up to 50m) zones of strong quartz-sericite +/- clay alteration.

Holes 16QVRAB005-7 and 10 were drilled to the north of the interpreted location of the east-trending Telegraph fault in an area mapped as being underlain by amphibolite. Holes 16QVRAB005 and 10 were terminated well before reaching their target depths due to strong faulting and fracturing in the rock adjacent to the Telegraph fault. 16QVRAB006, targeting a resistivity low at approximately 80 m depth, was collared in amphibolite and transitioned into felsic gneiss at approximately 54m depth; immediately above the mineralized intercept which starts at 59.44 m depth and continues to the end of the hole. 16QVRAB007, drilled 80 m to the east of 16QVRAB006, did not reach the resistivity low it was targeting but intersected anomalous gold up to 1.52 m at 0.402 g/t gold in the bottom quarter of the hole.

Holes 16QVRAB008, 9, 11 and 12 were all drilled south of the Telegraph fault. 16QVRAB011 and 12 collared in the eastern extension of the VG deposit, 55 m east of core hole QV13-013. Both holes cut strongly quartz-sericite-clay altered felsic gneiss with abundant oxidized pyrite. The distance between the base of the zone in the two holes is 25 m and sectional interpretation indicates the mineralized zone in this area dips to the north at 25-30°. Holes 16QVRAB008 and 9 were drilled to test a combined GT Probe-soil-resistivity target on the south side of the Telegraph fault, 165m and 265m, respectively, to the east of core hole QV13-013. Both holes collared in amphibolite and intersected 20m wide zones of chlorite-epidote+/-sericite alteration near surface, with anomalous gold values ranging from trace to 0.459 g/t over 1.52 m. Insufficient information is available to determine if these anomalous zones are related to an eastern extension of the VG zone, however, they do indicate the potential for mineralization within the amphibolite and further drilling in this area is required.

Holes 13 to 15 (16QVRAB013-015) were drilled on the northeastern flank of the VG deposit, in the north-south oriented draw and east of diamond drill holes QV12-03 and 07 and QV13-14 and 16, in order to test for extensions to the deposit in this area. Hole number 13 (16QVRAB013) reached a depth of 64.01 m before it was abandoned due to high water flow and low recovery prior to reaching its target depth of 100m, intersecting locally anomalous gold values.

Hole number 14 (16QVRAB014) was collared 40 m southeast of hole number 7 (QV12-007) and was drilled to the south at -55° intersecting a wide zone of gold mineralization, averaging 0.52 g/t gold over 64.01 m, starting at 16.76 m down hole and continuing until the end of the hole at 82.3 m depth. The upper part of the intercept included a 10.67 m interval averaging 1.65 g/t gold from 16.76 m down hole.

Hole number 15 (16QVRAB015), collared from the same site as hole number 14 (16QVRAB014), was drilled towards an azimuth of 20° in order to test for extensions further to the northeast. It intersected 4.57 m averaging 1.03 g/t gold at the bottom of the hole and was stopped at only 41.15m depth due to high water flow and low recovery. It is interpreted to have been just entering the zone of interest. Although the RAB holes did not transect the full thickness of the mineralized zone in the area, they are important as they demonstrate that the VG zone mineralization continues to the NE of the current resource area. Furthermore, when combined with previously reported RAB hole number 6 (16QVV006), it indicates over 200m of strike potential to the NE direction that should be tested with follow-up diamond drilling.

Hole number 16 (16QVRAB016) was drilled just to the south of the VG deposit and intersected anomalous gold over the top 24.38 m of the hole.

Holes number 17 (16QVRAB017) and 18 were drilled from a single pad 50 m north of diamond drill hole number 12 (QV13-012) on the western flank of the VG deposit. Hole number 17 (16QVVRAB-017), drilled to the south at -80°, intersected an upper zone of 12.19 m at 1.59 g/t gold from 24.38 m to 36.58 m down hole and a lower zone of 57.91 m averaging 1.89 g/t gold from 56.39 m to the end of the hole at 114.30 m, separated by 19.81 m with anomalous gold values. The lower intercept included a high-grade section of 12.19 m averaging 5.53 g/t gold from 83.82 m to 96.01 m down hole. Together the holes extended the VG deposit 100m down dip of QV13-12; it remains open and untested to the west in this area.

Hole number 18 (16QVRAB018), drilled to the north at -70°, intersected 4.57m at 0.99 g/t gold from 36.58 to 41.15 m and 18.29 m averaging 1.14 g/t gold between 85.34 m and 103.63m down hole, ending in the mineralized zone due to high water and loss of recovery.

Holes number 19 to 21 (16QVRAB019-021) were drilled from a single pad located 90 m southwest of QV13-012. All three holes were abandoned far short of their target depths due to strongly fractured/broken ground associated with faulting in the area; hole number 19 (16QVRAB019), however, intersected 6.10 m averaging 0.21 g/t gold from 7.62 to 13.72 m depth.

Holes number 22 to 23 (6QVRAB022-23) were drilled 110 & 135m downhill, respectively, to the south of holes number 19 to 21 (16QVRAB019-021) in order to test the western extent of the VG zone soil anomaly and anomalous GT Probe samples in the area. These holes were also abandoned short of target depth due to strongly oxidized and highly fractured ground conditions; both intersected gold mineralization over most of their lengths (see Table 3).

Hole 24 (16QVRAB024) was drilled 750 m WSW along strike of the VG deposit on an extension of the related gold-in-soil anomaly and along the Telegraph fault trend. The hole was collared 90 m east of the soil anomaly due to topographic constraints. It intersected 9.15 m averaging 0.326 g/t gold starting at 35.05 m down hole. The mineralization is hosted within strongly sericite altered felsic gneiss along a ENE oriented fault zone that appears to be a western extension of the Telegraph fault, and indicates strong potential for additional mineralization to the west of the current deposit.

Holes 25 to 31 (16QVRAB025-31) were drilled along a 460 m length of the Spirit fault at the Shadow zone, 12 km north of the VG deposit area. Only hole 16QVRAB025 reached its intended target depth due to significant groundwater encountered in holes 26 – 31. Anomalous gold (>0.1 g/t) was intersected in 5 of the 7 drill holes. The strongest mineralization intercepted was in Hole 29 (16QVRAB029), which was drilled to the south and intersected 9.14 m averaging 0.662 g/t gold at the bottom of the hole; including 1.52m of 1.07 g/t. Mineralization at Shadow is hosted within strongly fractured Kspar augen orthogneiss, with the strongest mineralization associated with zones of sericite alteration and quartz veining. Additional drilling will be required to fully test the potential of the Spirit fault in the area drilled and to investigate other areas of the 2500 m by 450 m target area.

Holes 32-34 (16QVRAB032-34) were drilled from a single pad on the eastern end of the gold-in-soil anomaly at the Stewart zone, located 5 km north of the VG deposit. Hole 32 was drilled to the north and completed to a depth of 147.83 m at -60. Hole 33 was attempted to be drilled to the west at a -60 but failed at 13.72m depth due to poor ground conditions. Hole 34 was drilled at -90. The most significant results returned were from hole 32; consisting of 64.01m of 0.103 g/t. The mineralization is associated strongly silicified felsic gneiss and, locally, amphibolite, with quartz stockwork veining and >5% disseminated sulfides along an interpreted E-W oriented fault. The fault is coincident with a 1200m x 175m trend of anomalous gold-in-soils and coincident resistivity anomalies. Altered quartz-feldspar porphyry dikes are also common in the area, but their relationship to mineralization is currently unknown. Additional drilling will be required to fully evaluate the potential of the Stewart zone.

A total of 26 of the 34 holes drilled during the 2016 RAB program were also surveyed using an optical downhole televiewer. The televiewer collects gyroscopic and magnetically oriented high resolution imagery down the drill hole for the collection of in situ structural data. Interpretation and analysis of the televiewer data is ongoing and will help refine the geologic interpretation of the area to aid in future drill targeting.

Table 2: QV RAB Drill Hole Information

Drill Hole	Easting (m)*	Northing (m)*	Elevation (m)	Azimuth	Dip	Depth (m)
16QVVRAB001	574627	7015937	517	340	-60	96.01
16QVVRAB002	574627	7015937	517	160	-60	100.58
16QVVRAB003	574656	7016016	526	160	-60	100.58
16QVVRAB004	574652	7015893	523	340	-65	121.92
16QVVRAB005	574731	7016158	559	160	-65	28.96
16QVVRAB006	574703	7016220	563	160	-60	94.49
16QVVRAB007	574783	7016227	580	160	-65	100.58
16QVVRAB008	574813	7016165	571	160	-65	141.72
16QVVRAB009	574899	7016214	586	160	-65	134.11
16QVVRAB010	574713	7016197	561	160	-55	45.72
16QVVRAB011	574705	7016096	542	160	-55	100.58
16QVVRAB012	574705	7016096	542	340	-50	32.00
16QVVRAB013	574508	7016289	494	160	-60	64.01
16QVVRAB014	574519	7016196	495	160	-55	82.30
16QVVRAB015	574519	7016196	495	20	-60	41.15
16QVVRAB016	574546	7016058	471	160	-60	67.06
16QVVRAB017	574359	7016048	528	160	-80	150.00
16QVVRAB018	574359	7016048	528	340	-70	103.63
16QVVRAB019	574299	7015940	504	160	-60	15.24
16QVVRAB020	574299	7015940	504	160	-65	18.29
16QVVRAB021	574299	7015940	504	160	-90	24.38
16QVVRAB022	574302	7015827	466	160	-60	22.86
16QVVRAB023	574312	7015804	466	160	-60	19.81
16QVVRAB024	573696	7015686	516	160	-60	82.30
16QVVRAB025	568757	7026647	528	0	-60	100.58
16QVVRAB026	568954	7026507	467	0	-60	51.82
16QVVRAB027	569069	7026493	456	0	-60	36.58
16QVVRAB028	569170	7026444	439	0	-60	73.15
16QVVRAB029	568997	7026591	506	180	-70	62.48
16QVVRAB030	569045	7026568	485	180	-60	25.91
16QVVRAB031	569045	7026568	483	180	-80	48.77
16QVVRAB032	576252	7020498	628	0	-60	147.83
16QVVRAB033	576255	7020499	629	90	-60	13.72
16QVVRAB034	576253	7020502	632	0	-90	109.73

*UTM Zone NAD 83 Zone 7

Methodology and QA/QC

The Ground Truth Exploration Inc. RAB drill that was utilized for the 2016 RAB program has the capability of drilling a 90 mm hole to a depth of 100-150 m, depending on ground conditions. The RAB drill rig is on a remotely-controlled track mounted platform which can be moved to nearby sites without helicopter support. Each sample represents 1.524 m of length down hole.

The analytical work reported for the 2016 program at QV was performed by Bureau Veritas Commodities Canada Ltd., an internationally recognized analytical services provider, at its Vancouver, British Columbia laboratory. Sample preparation was carried out at its Whitehorse, Yukon facility. All samples were prepared using procedure PRP70-250 (crush, split and pulverize 250 g to 200 mesh) and analyzed by method FA430 (fire assay with AAS finish) and AQ200 (aqua regia digestion and ICM-MS). The Company follows industry standard procedures for the work carried out on the QV Project, with a quality assurance/quality control (QA/QC) program. Blank, duplicate and standard samples were inserted into the RAB sample sequence sent to the laboratory for analysis. Comstock detected no significant QA/QC issues during review of the data.

Qualified Persons

Jodie Gibson, P.Geo. of Groundtruth Exploration Inc., a Qualified Person as defined by National Instrument 43-101, has supervised the exploration work and RAB drilling program at the QV Project and reviewed, verified (including sampling, analytical and test data) and compiled the data reported herein. Kristopher J. Raffle, P.Geo., Principal of APEX Geoscience Ltd. and a Qualified Person as defined by National Instrument 43-101, has reviewed and approved the scientific and technical disclosure relating to the QV exploration program.

2017 Fall Exploration Program at the QV Property

On September 15, 2016 the Company announced that it had commenced an exploration program planned to include approximately 1,500 m of HQ diamond drilling focussed on testing the along-strike potential to the west and east of the VG deposit and following up on positive results from the 2016 Rotary Air Blast (RAB) drilling program. In addition, detailed soil grids were planned on several high priority targets elsewhere on the +16,000 hectare QV property.

After completing its planned drilling program during the fall of 2017, on December 18, 2017 the Company reported results for a total of 904.4 m of HQ drill core in 6 holes were drilled on the western flank of the VG gold deposit; 3 were completed to target depth while the remainder did not reach planned depth due to drilling problems related to faulting ([Map 1](#)).

Highlights from the drilling program include:

- Diamond drill holes QV17-018 (45.5 m averaging 1.42 g/t gold, starting at 67.5 m down hole) and QV17-019 (51.2 m averaging 1.48 g/t gold, starting at 98 m down hole) confirm the VG deposit extends greater than 125 m down dip of hole QV13-12 and 45 m west of holes QV12-06,-08
- Broad intersection in QV17-018 also included a higher-grade core of 7 m averaging 3.58 g/t gold, starting at 94 m down hole, including 3 m averaging 4.46 g/t gold, also starting at 94 m down hole
- QV17-021, a 100 m step-out to the west of QV17-018/19, intersected an alteration zone with widespread anomalous gold mineralization extending from 87 m to 173 m down hole, including 4 m averaging 0.81 g/t gold starting at 139 m down hole, consistent with the interpreted western projection of the VG deposit but characterized by a rock package disrupted by considerable faulting and oxidation.

Weighted Average Intercepts from QV17-018-021

Hole ID	From (m)	To (m)	Interval (m)*	Au (g/t)	
QV17-018	30.00	34.50	4.50	0.94	
	67.50	113.00	45.50	1.42	
	<i>including</i>	94.00	101.00	7.00	3.58
	<i>including</i>	94.00	97.00	3.00	4.46
	133.80	134.80	1.00	1.37	
QV17-019	38.00	42.50	4.50	0.76	
	91.10	93.80	2.70	1.21	
	98.00	149.20	51.20	1.48	
	217.20	218.20	1.00	2.58	
QV17-021	139.00	143.00	4.00	0.81	

*True thickness is interpreted to be 85-90% of drilled width for QV17-018, 21 and 55-60% for QV17-019; intervals column may not add due to rounding;

Drill hole location and orientation details are provided below in Table 2 and are shown on [Map 1](#).

2017 QV Diamond Drill Hole Details

Hole	Zone	Easting*	Northing*	Elevation (m)	Azimuth	Dip	Total Depth (m)
QV17-018	VG	574358	7016045	534.8	0	-90	238.96
QV17-019	VG	574357	7016046	534.8	340	-65	267.31
QV17-020	VG	574264	7016013	538.5	160	-60	70.47
QV17-021	VG	574265	7016015	539.4	0	-90	210.82
QV17-022	VG	574169	7015973	515.6	160	-65	74.13
QV17-023	VG	574170	7015975	516.7	0	-90	42.67

*All coordinates referenced to *UTM Zone NAD 83 Zone 7

Methodology and QA/QC

The analytical work reported on herein was performed by ALS Canada Ltd., an internationally recognized analytical services provider. The Company follows industry standard procedures for the work carried out on the Preview SW project, with a quality assurance/quality control (QA/QC) program. Blank, duplicate and standard samples were inserted into the sample sequence sent to the laboratory for analysis. Comstock detected no significant QA/QC issues during review of the data.

Qualified Persons

Kristopher J. Raffle P.Geo., Principal, and Christopher Livingstone, P.Geo., Project Geologist of APEX Geoscience Ltd., Qualified Persons as defined by National Instrument 43-101, supervised the exploration work and diamond drilling program at the QV project and reviewed, verified (including sampling, analytical and test data) and compiled the data reported herein.

¹See this link for the [QV Technical Report](#);

Preview SW Gold Project

On September 13, 2016, the Company and Select Sands Corp. (TSX-V:SNS) ("Select Sands") completed a transaction pursuant to which the Company purchased Select Sands' Preview SW gold project located in the La Ronge district of Saskatchewan and early-stage Old Cabin property in Ontario (the "Assets"). The Company acquired the Assets in exchange for 20 million common shares (the "Shares") in the capital of the Company issued to Select Sands and the assumption of certain liabilities associated with the Assets. The closing price of the Shares on September 13, 2016 was \$0.26 per share and this was used to give the Assets a total value of \$5,200,000. The Company allocated 95% of the cost to Preview SW at \$4,940,000 and 5% of the cost to Old Cabin at \$260,000.

Given that Comstock and Select Sands have certain directors that serve as directors of both Comstock and Select Sands, each board appointed independent committees to review the transaction. Furthermore, each committee received independent fairness opinions confirming that the transaction is fair from a financial perspective to the shareholders of each of Comstock and Select Sands.

The Preview SW gold project is located 40 km north of La Ronge, Saskatchewan and 80 km southwest of Silver Standard Resources Inc.'s Seabee gold mine. The mineral rights to the 843 ha property are 100% owned by Comstock. Private company North-Sask Ventures Ltd. hold a 2.5% NSR of which an initial 1% may be purchased for \$1 million and the remaining 1.5% for \$2 million at any time prior to production decision. In addition, the following payments must be made to North-Sask Ventures: 1) \$60,000 upon receipt of a positive feasibility study and, 2) issuance of such number common shares of Comstock, determined by dividing \$87,500 by the closing price of the Company's common shares on the TSXV on the day before the acceptance by the TSXV of the transaction with Select Sands, upon making a production decision.

The Preview SW project database contains results from 162 core holes, totaling 26,250 m, drilled between 1985 and 2013. Of these, 136 were drilled on the main Preview SW deposit and form the basis for a NI 43-101 Resource Estimate (see September 28, 2016 news release) that included:

- Indicated resources containing 158,300 ounces of gold (2.61 million tonnes grading 1.89 g/t Au) based on a 0.50 g/t Au cut-off grade.
- Inferred resources containing 270,800 ounces of gold (5.70 million tonnes grading 1.48 g/t Au) based on a 0.50 g/t Au cut-off grade.

On September 28, 2016, the Company filed a NI 43-101 Technical Report entitled "Technical Report, Preview SW Gold Project, La Ronge, Saskatchewan" dated September 27, 2016 under the Company's profile on SEDAR. The filing of this report follows the Company's acquisition of the Preview SW project and supports the current mineral resource estimate for the Preview SW gold deposit referred to therein. This resource estimate was conducted by GeoSim Services Inc. Ronald G. Simpson, P. Geo., of GeoSim, is the Qualified Person, as defined under National Instrument 43-101, responsible for the resource estimates. Mineral resources have been classified using the definitions set out in CIM (2010).

The main Preview SW deposit is comprised of several sub-parallel northeast-trending gold-bearing quartz-sulphide mineralized structural zones, 500 m in strike length and totaling 150 m in width. Preliminary metallurgical test work indicates total gold recovery in concentrates ranged from 90% to 93% (see September 27, 2016 43-101 Technical Report).

In addition, there are six additional known gold zones on the property with only limited drilling. At the Preview North zone, located 2.6 km northeast of the Preview SW deposit, drill hole PR13-163 intersected:

- 17.98 g/t Au over 5.71 m starting at 10 m below surface;
- 5.96 g/t Au over 5.66 m starting at 19 m below surface; and,
- 1.88 g/t Au over 21.26 m starting at 29 m below surface

There has been insufficient drilling at the Preview North zone to determine the attitude of the reported mineralized intervals and, therefore, the above mineralized intersections may not represent true widths. No drilling has been carried out for over 600 m to the south of this hole.

Winter 2017 Diamond Drilling Program

On May 8, 2017, the Company reported initial results from the first three holes drilled during the winter diamond drilling program at Preview. A total of 1,777 m was completed in eight NQ drill holes during the winter phase of the program which paused for spring breakup. Drill hole details are included in the table at the end of the Preview SW section for the 2017 holes. Five holes totaling 945 m were completed at Preview North and three holes totaling 832 m at the northern area of the Preview SW deposit.

Significant weighted average intercepts from the first three holes completed at the Preview North zone are presented in the table below; for hole locations see [Map 1](#). These holes were designed to test for lateral and down-dip extensions to multiple high-grade gold intercepts previously reported from PR13-163 (17.98 g/t Au over 5.71 m starting at 10 m below surface, 5.96 g/t Au over 5.66 m starting at 19 m below surface and, 1.88 g/t Au over 21.26 m starting at 29 m below surface). Each of the holes encountered multiple zones of gold mineralization associated with quartz-carbonate vein zones and variable sulphide content in sheared intermediate-mafic meta-volcanic rocks; visible gold was locally observed.

Weighted Average Intercepts from PR17-164-167

Hole	Zone	From m	To m	Interval m*	Au g/t	
PR17-164	North	41.0	43.0	2.0	9.66	
		77.1	78.7	1.6	83.39	
		95.5	96.3	0.8	2.05	
PR17-165	North	58.6	60.9	2.3	5.31	
		75.0	86.0	11.0	1.28	
		<i>including</i>	79.0	84.0	5.0	2.15
PR17-166	North	21.0	22.0	1.0	3.62	
		41.0	53.0	12.0	4.64	
		<i>including</i>	41.0	46.0	5.0	10.33
		67.0	85.0	18.0	1.03	
<i>including</i>	67.0	70.0	3.0	3.04		
<i>and</i>		79.0	81.0	2.0	2.14	

*True thickness is interpreted to be approximately 85% of drilled width

The Preview North target is approximately 2.6 kilometres to the northeast of the Preview SW deposit and along the mineralized corridor that links the two areas. Historic (circa 1940's and 1960's) diamond drilling, limited surface and underground bulk sampling via a 50m trench and 20m exploration adit, in addition to three widely spaced diamond drill holes completed in 2013, have tested gold bearing quartz veins over a 200m northeast trending strike length and approximate 100m vertical depth. At the Preview North Zone, narrow quartz-carbonate veins locally containing coarse visible gold are hosted within an approximately 60 m true-width zone of strongly foliated pyrite-arsenopyrite (\pm chalcopyrite) mineralized intermediate to mafic meta-volcanic rocks. Host meta-volcanic rocks occur on the northeast margin of a less deformed coarse grained magnetic diorite intrusive body. Mineralization locally forms broad zones of highly strained, silicified, folded and boudinaged quartz-carbonate veins (for example drill holes PR13-163 and PR17-166 reported here).

Interpretation of historic exploration, recent and current diamond drill results of Comstock, suggest the presence of shallow-moderately south west plunging high grade gold zones, however further work and interpretation is required to determine the continuity of individual gold intercepts between holes.

On June 7, 2017, the Company reported results from the balance of the winter diamond drilling program at Preview SW which are set out below.

Significant weighted average intercepts from PR17-167-171 are presented in the table below. Hole locations are shown on [Map 1 \(North\)](#) and [Map 2 \(SW\)](#).

Weighted Average Intercepts from PR17-168-171

Hole	Zone	From m	To m	Interval m*	Au g/t
PR17-167	North	106	109	3	2.36
		136	138	2	2.39
		149	168.3	19.3	0.73
PR17-168	North	10	14	4	0.52
		65	70	5	0.61
		97	102	5	0.45
		127	130	3	0.91
PR17-169	Preview SW	67.5	172.3	104.8	1.01
<i>including</i>		98	101	3	2.75
<i>and</i>		112	118.4	6.4	2.57
<i>and</i>		127	130.5	3.5	6.62
<i>and</i>		158.5	161.5	3	4.06
		210	212.2	2.2	2.23
PR17-170	Preview SW	72	86.5	14.5	0.52
		165	171.5	6.5	1.87
PR17-171	Preview SW	78.3	79.8	1.5	3.08
		134.8	145	10.3	1.99
		181.6	182.1	0.5	4.68
		196.3	196.8	0.5	5.76
		199.7	200.6	0.9	208
		227.1	228	1	4.69
		264.5	273.7	9.2	1.17
		323.5	324.5	1	18.95

**True thickness is interpreted to be approximately 85% of drilled width; intervals column may not add due to rounding

The new drilling at Preview North, combined with historical work, has outlined a composite zone of up to 5 parallel shear hosted veins/vein zones extending 200 m along strike and to a depth up to 100 m below surface.

The 2017 Preview SW deposit area drilling very successfully infilled an open area of the resource model with PR17-169, which intersected multiple close-spaced vein zones with a weighted average of 1.01 g/t gold over 104.8 m; extended the deposit to the northeast by 30 m with hole PR17-170 in an area with limited historical drill density and swampy low-lying topography; and intersected high-grades (0.9 m at 208.00 g/t gold) in PR17-171, a 45 m down-dip step-back on section targeting ultra-high grade gold values previously intersected in drill hole PR13-151 (1,123 g/t Au over 2.3 m uncapped; including 4,279 g/t over 0.6 m (reported in the Company's March 4, 2013 news release). The Preview SW deposit as currently modelled comprises a series of nine (9) sub-parallel northeast-trending gold-bearing quartz-sulphide mineralized structural zones, 550 m in strike length and totaling 150 m in width.

Summer 2017 Diamond Drilling Program at Preview SW

On July 5, 2017, the Company announced that it had commenced a summer exploration program at its Preview SW gold project. On August 24, 2017 the Company announced that it had completed the summer program which consisted of a total of 2111.5 metres of diamond drilling in 11 holes; 7 on the Preview North zone and 4 at the southern end of the Preview SW deposit. Drill hole details are included in the table at the end of the Preview SW section for the 2017 holes. In addition to the drilling program, humus sampling, detailed ground magnetics, high resolution drone surveys and structural studies were completed on the property during the summer program.

On September 28, 2017 Comstock reported partial results from the summer diamond drilling at Preview SW for 7 NQ drill holes completed on the North zone.

The 2017 Preview North zone holes were designed to test for lateral and down-dip extensions to multiple high-grade gold intercepts previously reported in the Company's [May 8, 2017](#) and [June 7, 2017](#) news releases and from PR13-163 (17.98 g/t Au over 5.71 m starting at 10 m below surface, 5.96 g/t Au over 5.66 m starting at 19 m below surface and, 1.88 g/t Au over 21.26 m starting at 29 m below surface¹). Each of the 2017 holes encountered multiple zones of gold mineralization associated with quartz-carbonate vein zones and variable sulphide content in sheared intermediate-mafic meta-volcanic rocks; visible gold was observed in drill holes PR17-164 and PR17-165 ([May 8, 2017 news release](#)) and holes PR17-175-178.

Significant weighted average intercepts are presented in the table below. Hole locations are shown on [Map 1](#).

Weighted Average Intercepts from PR17-172-178

HOLE ID	Zone	FROM (m)	TO (m)	INTERVAL (m)*	Au g/t
PR17-172 <i>including</i>	North	46.30	58.00	11.70	0.41
		81.00	89.00	8.00	1.18
		81.00	83.00	2.00	3.45
		105.00	125.00	20.00	0.45
PR17-173	North	88.00	97.20	9.20	0.47
PR17-174	North	82.30	86.60	4.30	1.64
		128.20	133.60	5.40	0.61
PR17-175 <i>including</i>	North	20.50	24.70	4.20	9.66
		41.15	44.40	3.25	87.16
		41.15	42.40	1.25	220.96
PR17-176 <i>including and including including including</i>	North	9.25	9.80	0.55	13.20
		23.30	40.00	16.70	5.08
		23.30	25.00	1.70	3.01
		28.00	32.20	4.20	17.40
		29.40	30.00	0.60	108.00
		51.00	56.00	5.00	16.19
PR17-177 <i>including</i>	North	42.50	61.00	18.50	1.21
		51.00	58.00	7.00	2.45
PR17-178	North	184.00	189.00	5.00	2.15

*True thickness is interpreted to be approximately 75-85% of drilled width for most holes; PR17-176 was drilled at a steeper angle and true width is interpreted to be approximately 60% of drilled width; intervals column may not add due to rounding

Interpretation of historical exploration, recent and current diamond drill results of Comstock, suggest the presence of steeply plunging high grade gold zones at the North Zone and moderately southwest plunging zones at the Preview SW deposit, however further work and interpretation is required to determine the continuity of individual gold intercepts between holes.

On November 9, 2017 the Company reported the balance of results from the summer program at Preview SW which included results from 1,017.0 m in 4 NQ drill holes completed on the southern flank of the Preview SW deposit, continued modelling of North zone mineralized zones, as well as surface sampling.

Highlights from the summer program include:

- Multiple high-grade gold intercepts below historical 50 m production trench at the North zone, including 3.25 m averaging 87.16 g/t gold in PR17-175 starting at 41.15 m depth and including 1.25 m averaging 220.96 g/t gold starting at 41.15 m depth (true thickness is interpreted to be 75-85% of drilled width; previously disclosed in [September 28, 2017 news release](#))
- Drilling in the southern sector of the Preview SW deposit was successful in extending select zones further south (10.00 m averaging 1.04 g/t in PR17-179; 11.52 m averaging 1.12 g/t gold in PR17-181) and intersecting visible gold – [Map 1](#)
- Orientation humus soil geochemical sampling covering the North and C zones defines 3 gold-in-soil anomalies not associated with known areas of mineralization – [Map 2](#)

- A detailed structural study by SRK (Canada) Inc. has helped to recognize key relationships between gold mineralization, lithology and shear intensity and has provided a 3D interpretation that will assist in future resource and exploration targeting
- Reconnaissance rock sampling in areas of under-explored historical showings on the property returned significant gold values, including 23.5 g/t gold from the Clearwater A showing – [Map 3](#)

At the North zone, new modelling of the drill data modelling has defined three (formerly five) principal parallel structures/veins/vein zones along which the main mineralized intercepts occur, extending 350 m along strike and to a depth up to 140 m below surface; higher grades intersected to date occur within a core zone over a strike length of approximately 170 m. Structural data collected during the winter and summer programs indicates a steep plunge to the mineralization, suggesting good potential for encountering additional gold mineralization at depth, as evidenced by the longitudinal sections for [Zone 1](#), [Zone 2](#) and [Zone 3](#). There is also excellent potential for identifying additional high-grade shoots along and across strike, or as blind zones at depth. A 3D visualization of the North zone drill holes and interpreted zones can be found by following this [link](#).

Drilling at the southern half of the SW deposit were designed to: 1) to test down-plunge (PR17-179) or up-plunge (PR-180) of adjacent holes and to test for southwestern continuity of the eastern lodes and 2) to test the southwest strike extent of the SW deposit (PR17-181, 182). Significant weighted average intercepts are presented in the table below. Hole locations are shown on [Map 1](#).

Weighted Average Intercepts from PR17-179-182

HOLE ID	Zone	FROM (m)	TO (m)	INTERVAL (m)*	Au g/t
PR17-179 <i>including</i> <i>including and including</i>	SW	25.30	37.00	11.70	1.12
		54.00	63.50	9.50	2.07
		74.00	87.00	13.00	1.96
		77.00	79.00	2.00	10.48
		111.20	117.00	5.80	4.62
		126.00	145.50	19.50	1.23
		134.00	137.00	3.00	3.61
		142.50	145.50	3.00	2.95
		150.50	160.50	10.00	1.04
PR17-180 <i>including</i>	SW	11.00	12.00	1.00	3.12
		31.00	34.20	3.20	1.20
		62.00	70.50	8.50	0.93
		62.00	64.50	2.50	1.85
		68.50	70.50	2.00	1.21
		115.80	116.80	1.00	3.61
		136.40	138.40	2.00	1.54
PR17-181 <i>including</i> <i>including</i>	SW	156.00	157.00	1.00	4.23
		196.50	208.00	11.50	1.12
		200.00	203.00	3.00	2.91
		246.30	252.70	6.40	0.67
		246.30	247.00	0.70	3.06
PR17-182	SW				NSV**

*True thickness is interpreted to be approximately 75-85% of drilled width for most holes; intervals column may not add due to rounding; **NSV = no significant values

2017 Preview SW Project Drill Hole Data

Hole ID	Zone	Easting*	Northing*	Elevation (m)	Azimuth	Dip	Total Depth (m)
PR17-164	North	511399	6140998	397	122.0	-43.3	256
PR17-165	North	511397	6141030	396	121.5	-46.2	204
PR17-166	North	511445	6141030	397	122.0	-46.6	107
PR17-167	North	511365	6141049	397	122.0	-45.0	198
PR17-168	North	511324	6140975	398	170.0	-45.0	180
PR17-169	SW	510119	6139520	392	112.0	-45.0	226
PR17-170	SW	510138	6139618	384	112.0	-45.0	256
PR17-171	SW	509992	6139538	397	116.0	-45.0	351
PR17-172	North	511422	6141047	396	121.5	-45.0	150
PR17-173	North	511342	6140999	397	122.0	-45.0	177
PR17-174	North	511367	6141020	398	121.5	-45.0	174
PR17-175	North	511493	6141040	398	122.5	-49.9	102
PR17-176	North	511493	6141040	398	122.5	-64.2	126
PR17-177	North	511501	6141075	410	122.0	-46.6	115
PR17-178	North	511360	6141050	402	122.0	-53.1	251
PR17-179	SW	510004	6139251	393	112.0	-45.1	219
PR17-180	SW	510004	6139206	394	111.5	-44.4	207
PR17-181	SW	510067	6139043	395	292.0	-44.7	291
PR17-182	SW	510031	6138948	395	292.0	-54.8	300

*All coordinates referenced to North American Datum 1983 UTM Zone 13N

On January 23, 2018 the Company reported results from new metallurgical test work completed on sample materials from the Preview SW deposit. The test work was completed at ALS Metallurgy of Kamloops B.C., in December 2017 under the direction of Jeffrey B. Austin, P.Eng and is a follow-up to previous testing completed in 2013. Test work in 2017 was focused on better defining the quality of gravity and flotation concentrates that are expected from the Preview project materials and providing preliminary test results for cyanide leaching of flotation concentrate.

Highlights Included:

- Combined gold recovery for both gravity and bulk flotation processes in the current test work is estimated at 82 percent for zone 103 and 89 percent for zone 104 and compares well with the previous metallurgical results of 2013.
- Cyanide leaching of flotation concentrates indicated that in excess of 98 percent of the gold contained in flotation concentrates could be extracted using industry standard cyanide leaching conditions.

This test work better defines the potential processing options for the Preview project and indicates that gold recovery using gravity, flotation and concentrate leaching is possible. As well, flotation concentrates were shown to have sufficient quality to warrant evaluating the off-site processing alternatives of these concentrates in order to potentially simplify on-site processing. Optimization work is still required for the metallurgical process at Preview, but no significant metallurgical issues related to gold recovery have been identified from the work to date.

Metallurgical studies, data interpretation and detailed planning for the next phase of work at Preview is ongoing.

Methodology and QA/QC

The analytical work reported on from the 2017 program at Preview SW was performed by ALS Canada Ltd., an internationally recognized analytical services provider. The Company follows industry standard procedures for the work carried out on the Preview SW project, with a quality assurance/quality control (QA/QC) program. Blank, duplicate and standard samples were inserted into the sample sequence sent to the laboratory for analysis. Comstock detected no significant QA/QC issues during review of the data.

Qualified Persons

Kristopher Raffle P.Geo., Principal, and Chris Livingstone, P.Geo., Project Geologist of APEX Geoscience Ltd., Qualified Persons as defined by National Instrument 43-101, supervised the exploration work and diamond drilling program at the Preview SW project and reviewed, verified (including sampling, analytical and test data) and compiled the data reported herein. Jeffrey B. Austin, P.Eng. supervised the metallurgical testwork completed in 2017.

¹See this link for the [Preview SW technical report](#);

Old Cabin Project

A 100% interest in the Old Cabin project was acquired by Comstock as part of the transaction with Select Sands described above in the Preview SW project section. 1,118 ha Old Cabin project is located 80 km northeast of Wawa, Ontario and 10 km east of Richmond Mines' Island Gold Mine. The property has had surface sampling and geological mapping carried out, resulting in the discovery of 13 discrete gold zones, all associated with shear zones and strong iron carbonate alteration.

Mexico

The Corona Gold-Silver Project is located in the Ocampo-Uruachic District of western Chihuahua, Mexico - a centre of gold and silver production for over 300 years. As a result of Fresnillo PLC's discovery of the Orisyvo gold deposit (Indicated & inferred resources: 2.72 million ounces of gold in oxides and 6.51 million ounces of gold in sulphides), the Uruachic district has drawn the attention of a number of gold exploration companies in addition to Comstock.

During the year ended September 30, 2013, the Company completed all option requirements and earned a 50% interest in the Corona Property. During the year ended September 30, 2014, the Company recognized an impairment charge of \$1,260,806 to write down the Corona Property to \$1.

On December 7, 2015, Golden Goliath Resources Ltd., which holds the other 50% interest in the Corona Property, announced that it had signed an option agreement with Fresnillo PLC that includes the Corona property. Under the terms of the agreement, Fresnillo PLC may earn a 100% interest (subject to a 1% NSR half of which may be purchased for US\$500,000) in the Corona property as well six other properties held by Golden Goliath by making cash payments totaling US\$3 million over 3 years and by paying all mining rights (property taxes) and conducting all assessment work required to keep the properties in good standing. Comstock estimates its potential share of these option payments to be US\$200,000 if all option payments are made by Fresnillo PLC over the three year period. Fresnillo PLC has the right to terminate the option agreement at any time. During the six months ended March 31, 2018, the Company received \$9,068 in option payments from Golden Goliath (2017 - \$9,590).

See also Subsequent Events hereafter for the Company's new Rawhide Property option agreement.

Results of Operations for the Six Month Period Ended March 31, 2018

For the six month period ended March 31, 2018, the Company incurred a comprehensive loss of \$97,291 (2017 – \$643,903). The decrease in loss of \$546,612 is due in part to the following differences between the two periods:

- Share based compensation decreased to \$Nil (2017 - \$472,269) due to the Company not granting options in the current period.
- Travel decreased to \$8,494 (2017 - \$18,623) due to less travel by management to the Company's projects in the current period.
- Flow-through Liability reversed increased to \$107,000 (2017 - \$64,480) due to a larger flow through premium being reversed in the current period.

As at March 31, 2018, exploration and evaluation assets totaled \$13,491,019 (September 30, 2017 - \$12,936,325).

Cash Flows

For the six months ended March 31, 2018, the Company's net cash used in operating activities was \$207,617 compared to \$228,628 in the comparative 2017 period. The balances are relatively consistent across periods.

Net cash used in investing activities for the six months ended March 31, 2018 was \$809,393 compared to \$1,055,595 in the comparative 2017 period. The Company has slightly decreased exploration spending on its QV Gold Project and Preview SW Gold Project in the current period.

Net cash provided by financing activities was \$485,432 compared to \$2,546,931 in the 2017 comparative period. The Company raised \$535,000 (2016 - \$2643,026) by share private placements and spent \$49,568 (2016 - \$97,250) on associated share issue costs.

The Company's cash decreased by \$531,578 during the six months ended March 31, 2018 compared to a \$1,262,708 increase in the 2017 comparative period. The Company's cash balance as of March 31, 2017 was \$873,008 compared to \$1,404,586 at September 30, 2017.

Summary of Quarterly Results

This table sets forth selected quarterly financial information for each of the last eight quarters:

Three Months Ended	Mar. 31 2018 \$	Dec. 31 2017 \$	Sep. 30 2017 \$	Jun. 30 2017 \$	Mar. 31 2017 \$	Dec. 31 2016 \$	Sep. 30 2016 \$	Jun. 30 2016 \$
Total option revenues	-	9,068	-	9,643	-	9,590	9,900	-
Net and comprehensive income (loss)	10,917	(108,208)	(196,024)	(211,280)	(490,925)	(152,978)	(1,261,264)	(164,675)
Net loss per share – basic and diluted	\$0.00	\$(0.00)	\$(0.00)	\$(0.00)	\$(0.01)	\$(0.00)	\$(0.05)	\$(0.01)

The above quarterly results were prepared in accordance with International Financial Reporting Standards (“IFRS”). The Company recorded net income for the three month period ended March 31, 2018 mainly due to a \$107,000 flow-through shares liability reversal. The increase in loss for the quarter ending September 30, 2016 is mostly due to the impairment of the Patterson Lake property and the granting and vesting of stock options. The increased loss for the quarter ended March 31, 2017 is due to the granting of stock options that were valued at \$428,000 using the Black-Scholes model.

Three month period ended March 31, 2018

The Company's focus during the three month period ended March 31, 2018 was to continue evaluating its exploration options for its QV Gold and Preview SW Gold Properties. Towards the end of the quarter, the Company also entered into negotiations for the Rawhide Property (see subsequent events for further details).

Liquidity

As of March 31, 2018, the Company has working capital of \$836,492 (September 30, 2017 - \$1,061,632) and cash on hand of \$873,008 (September 30, 2017 - \$1,404,586). This working capital consisted primarily of cash less accounts payable and accrued liabilities.

Capital Resources

See also Subsequent Events hereafter for the Company's private placement announced April 2018.

On December 28, 2017, the Company closed a non-brokered private offering of flow-through units (“FT Units”). Pursuant to the offering the Company issued a total of 5,944,443 FT Units at a price of \$0.09 per FT Unit raising aggregate gross proceeds of \$534,999.87.

Each FT Unit was issued at a price \$0.09 and consists of one flow-through common share in the capital of the Company (a “FT Share”) and one-half of one common share purchase warrant (each whole warrant a “FT Warrant”). Each FT Warrant entitles the holder thereof to purchase one additional non flow-through common share of the Company at an exercise price of \$0.15 per Share for a period of 18 months from the Closing Date.

The FT Warrants include an acceleration clause, whereby, if the closing price of the Company's common shares on the TSX Venture Exchange (or such other exchange on which the common shares may trade) is at a price equal to or greater than \$0.20 for a period of 10 consecutive trading days, the Company will have the right to accelerate the expiry date of the FT Warrants. If the Company exercises such right, it will give written notice to the holders of the FT Warrants that such warrants will expire 30 days from the date of notice to the warrant holders. Such notice by the Company to the holders of the FT Warrants may not be given until 4 months and one day after the closing date.

In connection with the closing of the financing the Company paid finders an aggregate fee of \$35,490 and issued an aggregate of 394,332 compensation warrants. Each compensation warrant entitles the holder thereof to acquire one common share at a price of \$0.15 per Unit for a period of 18 months from the closing date.

The securities issued in this financing are subject to a hold period that expired on April 29, 2017.

On February 27, 2017 (the "Closing Date"), the Company closed a non-brokered private placement for an aggregate of \$2,643,126 comprising 13,344,157 of units ("Units") and up to 3,563,900 flow-through units ("FT Units").

Each Unit was priced at \$0.15 and consists of one common share in the capital of the Company (a "Share") and one common share purchase warrant (a "Warrant"). Each Warrant entitles the holder thereof to purchase one additional common share of the Company at an exercise price of \$0.20 per Share for a period of 24 months from the Closing Date. Each FT Unit was priced at \$0.18 and consists of one flow-through common share in the capital of the Company (a "FT Share") and one-half of one non-transferable common share purchase warrant (each whole warrant a "FT Warrant"). Each FT Warrant will entitle the holder thereof to purchase one additional non flow-through common share of the Company (a "Share") at an exercise price of \$0.20 per Share for a period of 24 months from the Closing Date.

The Warrants and FT Warrants include an acceleration clause, whereby, if the weighted average trading price of the Company's common shares on the TSX Venture Exchange (or such other exchange on which the common shares may trade) is at a price equal to or greater than \$0.40 for a period of 20 consecutive trading days, the Company has the right to accelerate the expiry date of the Warrants and FT Warrants. If the Company exercises such right, it will give written notice to the holders of the Warrants and FT Warrants that such warrants will expire 30 days from the date of notice to the warrant holders. Such notice by the Company to the holders of the Warrants and FT Warrants may not be given until 4 months and one day after the Closing Date.

The Company used the gross proceeds of the offering of FT Units for eligible exploration expenditures, which will constitute "Canadian Exploration Expenses" ("CEE") that are "Flow-Through mining expenditures", as defined in the *Income Tax Act* (Canada) which can be renounced to purchasers of the FT Units for the 2017 taxation year in the aggregate amount of not less than the total amount of the gross proceeds raised from the flow-through offering. The CEE shall be incurred no later than December 31, 2018. The proceeds from the offering of Units will be used to fund exploration on the Company's mineral properties and for general working capital.

In connection with the closing of the financing, the Company paid finders an aggregate commission of \$58,319 and issued an aggregate of 352,898 compensation options. Each compensation option entitles the holder thereof to acquire one Unit at a price of \$0.15 per Unit for a period of 24 months from the Closing Date.

The securities issued in this financing were subject to a hold period that expired on June 28, 2017.

The Company has financed its operations primarily by the issuance of share capital. The continued operations of the Company are largely dependent on the sale of equity securities to raise capital. Details of the Company's financing activities can be found in Note 7 of the Company's consolidated financial statements for the year ended September 30, 2017.

Off-Balance Sheet Arrangements

The Company has not entered any off-balance sheet arrangements.

Board of Directors and Officers

On May 15, 2018, the Company appointed Steven H. Goldman as Interim President and CEO; and the Company accepted the resignation of each of Dr. David Terry Ph.D. as President, Chief Executive Officer and Director and Mr. Ken Kuchling and Mr. Douglas Turnbull as Directors.

At the Company's annual and special meeting of shareholders held May 16, 2018, Mr. Steven Goldman, Mr. Rasool Mohammad, Mr. Robert Luffman and Mr. Arnold Tenney were elected as directors of the Company.

As of the date of this report, the Company has the following officers and directors.

Steven H. Goldman, Interim President & CEO / Director

Steven H. Goldman is a senior partner in the Toronto law firm of Goldman Hine LLP. Before joining that firm, he successfully led the restructuring and turnaround of the Speedy Auto Service and Minute Muffler franchise systems as their President and CEO from December 2007 until December 2009. Mr. Goldman graduated from Carleton University in 1976 (BA, President's Medal) and from Queen's University in 1980 (LLB/JD). Mr. Goldman was called to the Bar in Ontario in 1982. He is a member of the Executive of the Ontario Bar Association, Franchise Section, the Law Society of Upper Canada, the American Bar Association Forum on Franchising, and the Institute of Corporate Directors. He is also a former Director of Tribute Pharmaceuticals Inc., Alegro Health Corp. and Select Sands Corp.

Rasool Mohammad, Chairman / Director

Mr. Mohammad has worked in mining and mineral exploration industry throughout the Americas. He graduated from the NWFP University of Engineering and Technology, Peshawar, Pakistan in 1991 with a B.Sc. (Mining Engineering). He has over 20 years of work experience in the mining and mineral exploration industry. He speaks English, Spanish, Urdu and Pashto. Mr. Mohammad is also COO / Director of Select Sands Corp (trading on TSX.V as symbol SNS).

Robert Luffman, Director

Robert Luffman, a Canadian CPA, CMA (certified management accountant), has close to 30 years of financial experience in a variety of businesses and charitable endeavors. Mr. Luffman currently serves as the Chief Financial Officer of Gracetree Investments, LLC, a family office in Bristol, Tennessee. Gracetree has numerous successful investments in the pharmaceutical industry, real estate, information technology, and other private businesses. Mr. Luffman began his career as an accountant at the United Co-operatives of Ontario and served for 13 years as a Division Controller of what is now AGC Glass North America, a Japanese-owned international automotive, residential and commercial glass manufacturer. Mr. Luffman is serving or has served on a number of corporate and charitable boards.

Mr. Luffman received his designation from the Society of Management Accountants of Ontario in 1992 and is currently a member of ACAUS (Association of Chartered Accountants in the U.S.).

Arnold Tenney, Director

Mr. Tenney has been an advisor to the Company for the past year. In addition, Mr. Tenney was the Chairman and a director of Tribute Pharmaceuticals Inc. from April 2004 to February 2016. Mr. Tenney was a financial consultant at Devine Entertainment Corporation ("Devine"), a children and family film production and development company from 2002 to 2011. Prior to his position at Devine, Mr. Tenney was Chief Executive Officer of ARC International Corporation from 1978 to 2000. ARC International Corporation was a developer of indoor ice arenas and tennis clubs, as well as an investment company involved in entertainment and cable television. Mr. Tenney was a director and Chairman of the Board of Cabletel Communications from 1985 to 2000, which was a leading supplier of broadband equipment to the cable television industry. Mr. Tenney was a director of Ballantyne of Omaha, Inc. from 1988 to 2000 and served as Chairman of the Board from 1992 to 2000. Ballantyne of Omaha, Inc. was a leading manufacturer of commercial motion picture projection equipment. Mr. Tenney served as a director for Phillip Services Inc., a Canadian metal recycling company, from 1998 to 2000. He served in such capacity as a representative of Mr. Carl Icahn.

Darren Urquhart, CFO

Mr. Urquhart is a chartered professional accountant with twenty years of experience working in public practice and industry. Mr. Urquhart operates his own public practice accounting firm offering chief financial officer and accounting services to TSX Venture Exchange listed companies in Vancouver. He has also served as director for some of his corporate clients. Mr. Urquhart began his career working as an audit accountant with Grant Thornton LLP, then later worked as a senior tax accountant with Lohn Caulder Chartered Accountants. Mr. Urquhart obtained his chartered accountant designation in 2001 and is a member of the Chartered Professional Accountants of British Columbia. In 1995, Mr. Urquhart graduated from the University of British Columbia with a Bachelor degree of Applied Science in Electrical Engineering.

Transactions with Related Parties

The Company incurred the following transactions with respect to officers and directors of the Company or corporations controlled by them during the six months ended March 31, 2018 and 2017:

	Six Months ended March 31, 2018	Six Months ended March 31, 2017
Steven Goldman – Consulting fees	\$ 6,000	\$ 6,000
Steven Goldman – Share based compensation	-	41,419
Rasool Mohammad – Consulting fees	12,000	12,000
Rasool Mohammad – Share based compensation	-	55,226
Robert Luffman – Consulting fees	6,000	-
Robert Luffman – Share based compensation	-	41,419
Darren Urquhart – Consulting fees	21,000	21,000
Darren Urquhart – Share based compensation	-	41,419
David Terry (Former CEO & Director) – Consulting fees	90,000	90,000
David Terry (Former CEO & Director) – Share based compensation	-	82,839
Doug Turnbull (Former Director) – Consulting fees	6,000	6,000
Doug Turnbull (Former Director) – Share based compensation	-	41,419
Ken Kuchling (Former Director) – Consulting fees	6,000	-
Ken Kuchling (Former Director) – Share based compensation	-	41,419
Total cash compensation	147,000	135,000
Total share-based compensation	-	345,160
Total compensation of officers and directors	\$ 147,000	\$ 480,160

Note: Share based compensation is a non-cash expense for valuing stock option grants that is computed using the Black-Scholes Valuation Model.

Related party balances included in accounts payable and accrued liabilities

	March 31, 2018	September 30, 2017
Due to companies controlled by directors	\$ 7,130	\$ 7,529
Due to company with common directors	2,118	2,550
	\$ 9,248	\$ 10,079

The Company paid \$12,967 for shared rent and office services to a company with common directors during the six month period ended March 31, 2018 (2017 - \$12,490).

Proposed Transactions

As is typical of the mineral exploration and development industry, the Company is continually reviewing potential acquisition and joint venture transactions and opportunities that could enhance shareholder value. At present, there are no transactions being contemplated by management or the board that would affect the financial condition, results of operations and cash flows, other than in the normal course of the Company's business.

Critical Accounting Estimates

Mineral properties consist of exploration and mining concessions, options and contracts. Acquisition and exploration costs are capitalized and deferred until such time as the property is put into production, or the property is disposed of either through sale or abandonment. If put into production, the costs of acquisition and exploration will be written off over the life of the property, based on estimated economic reserves. Proceeds received from the sale of any interest in a property will be credited against the carrying value of the property, with any excess included in operations for the year. If a property is abandoned, the acquisition and deferred exploration costs will be written off to operations.

Although the Company has taken steps to verify title to mineral properties in which it has an interest, in accordance with industry norms for the current stage of exploration of such properties, these procedures do not guarantee the Company's title. Property may be subject to unregistered prior agreements and non-compliance with regulatory requirements. The Company is not aware of any disputed claims of title.

Recorded costs of mineral properties and deferred exploration expenditures are not intended to reflect present or future values of mineral properties. The costs are subject to measurement uncertainty and it is reasonably possible, based on existing knowledge, that change in future conditions could require a material change in the recognized amount.

Management reviews capitalized costs on its mineral properties on a periodic basis and will recognize impairment in value based upon current exploration results and upon management's assessment of the future probability of profitable revenues from the property or from sale of the property.

The Company measures the cost of the service received for all stock options made to consultants, employees and directors based on an estimate of fair value at the date of grant. The Company uses the Black-Scholes option pricing model to estimate the fair value of each stock option at the date of grant. Stock options which vest immediately are recorded at the date of grant. Stock options that vest over time are recorded over the vesting period using the straight line method. Stock options issued to outside consultants that vest over time are valued at the grant date and subsequently re-valued on each vesting date and expensed as services are rendered. Stock based compensation is recognized as expensed or, if applicable, capitalized to mineral property costs with a corresponding increase in contributed surplus. On exercise of the stock option, consideration received and the estimated fair value previously recorded in contributed surplus is recorded as share capital.

Financial Instruments and Other Instruments

The Company has not entered into any specialized financial agreements to minimize its investment risk, currency risk or commodity risk. As of the date hereof, the Company's investment in resource properties has full exposure to commodity risk, both upside and downside. As the metal prices move so does the underlying value of the Company's metal projects.

Outstanding Share Data as of the Report Date

As of the date of this report, there was an aggregate of 79,720,130 common shares issued, 33,905,383 warrants outstanding at a weighted average exercise price of \$0.20 and 6,280,000 stock options outstanding at a weighted average exercise price of \$0.24.

A summary of the warrants outstanding as of the date of this report follows:

Expiry date	Quantity	Exercise price
June 10, 2018	10,458,397	\$0.18
June 10, 2018	39,958	\$0.15
* June 10, 2018	327,425	\$0.12
June 28, 2018	2,048,274	\$0.18
June 28, 2018	9,310	\$0.15
* June 28, 2018	52,962	\$0.12
July 26, 2018	2,120,000	\$0.35
** July 26, 2018	3,500	\$0.25
February 27, 2019	15,126,107	\$0.20
*** February 27, 2019	352,898	\$0.15
June 28, 2019	3,366,552	\$0.15
	33,905,383	

* Each Broker unit entitles the holder thereof to purchase one unit of the Company until June 10, 2018 at an exercise price of \$0.12 per unit. Each unit consists of one common share of the Company and one common share purchase warrant of the Company with an exercise price of \$0.18.

** Each Unit broker warrant entitles the holder thereof to purchase one unit of the Company until July 26, 2018 at an exercise price of \$0.25 per unit. Each unit consists of one common share of the Company and one-half of one common share purchase warrant of the Company with an exercise price of \$0.35.

*** Broker unit: entitles the holder thereof to acquire one unit at a price of \$0.15 per unit until the expiry date. Each unit consists of one common share in the capital of the Company and one common share purchase warrant. Each warrant entitles the holder thereof to purchase one additional common share of the Company at an exercise price of \$0.20.

A summary of the options outstanding as of the date of this report follows:

Expiry date	Quantity	Exercise price
March 17, 2021	730,000	\$0.25
April 7, 2021	120,000	\$0.25
May 20, 2021	520,000	\$0.15
August 15, 2021	1,610,000	\$0.355
September 16, 2021	200,000	\$0.28
March 31, 2022	3,100,000	\$0.195
	6,280,000	

Subsequent Events

Rawhide Property Option Agreement

On April 5, 2018, the Company entered into an option agreement whereby it can acquire a 100% interest in five mining claims comprising 42 claim units (662 ha) located in the Gowganda area of the historic Greater Cobalt Mining Camp of northern Ontario, comprising the Rawhide cobalt-silver property (the "Rawhide Property").

Under the terms of the option agreement, the Company can earn a 100% interest in the Rawhide Property by making cash and common share payments to the optionors, and completing exploration expenditure commitments, over two years. Details are provided in the table below.

Timing	Cash Payment	Share Payment	Expenditure
Receipt of regulatory approval	\$30,000	200,000	
6 Months from Signing	\$30,000	200,000	
12 Months from Signing	\$35,000	200,000	\$100,000
18 Months from Signing	\$35,000	200,000	
24 Months from Signing	\$45,000	200,000	\$400,000
Total	\$175,000	1,000,000	\$500,000

The option agreement has been approved by the TSX Venture Exchange. The Company has made the first payment of \$30,000 and issued 200,000 common shares to the vendors.

In addition, if the option is exercised by the Company, the optionors will retain a 2% Net Smelter Returns royalty (NSR) on future production from the Rawhide Property, 1% of which can be purchased at any time for \$1 million.

Private Placement

On April 18, 2018, the Company announced a non-brokered private placement financing of units ("Unit") to raise gross proceeds of up to \$500,000 (the "Offering") to fund exploration on the Company's properties and for general corporate purposes. The Company will have the option of increasing the size of the offering by up to \$200,000 prior to closing. It is proposed that each Unit will be issued at a price of \$0.05 per Unit with each Unit consisting of one common share and one common share purchase warrant (each whole warrant referred to as a "Warrant"). Each Warrant will be exercisable into a common share of Comstock (a "Warrant Share") for a period of 24 months from the closing date at an exercise price of \$0.10.

The Warrants issued as part of the Unit Offering will be subject to an acceleration clause, whereby, if the weighted average trading price of the Company's common shares on the TSX Venture Exchange (or such other exchange on which the common shares may trade) is at a price equal to or greater than \$0.15 for a period of 10 consecutive trading days, the Company will have the right to accelerate the expiry date of the Warrants. If Comstock exercises such right, the Company will give written notice to the holders of the Warrants that the Warrants will expire 30 days from the date of notice to the Warrant holders. Such notice by the Company to the holders of the Warrants may not be given until 4 months and one day after the closing date.

Completion of the offering is subject to receipt of applicable regulatory approvals, including the approval of the TSX Venture Exchange. The securities issued by the Company in connection with the offering will be subject to a four month hold period as prescribed by applicable securities laws. Finders fees may be paid on a portion of the offering.

Risks and Uncertainties

The Company is subject to a number of risks and uncertainties due to the nature of its business. The Company's exploration and development activities expose the Company to various financial and operational risks that could have a significant impact on its level of operating cash flows in the future. Readers are advised to study and consider risk factors stressed below.

The following are identified as main risk factors that could cause actual results to differ materially from those stated in any forward-looking statements made by, or on behalf of, the Company.

General Resource Exploration Risks and Competitive Conditions

The resource exploration industry is an inherently risky business with significant capital expenditures and volatile metals markets. The marketability of any minerals discovered may be affected by numerous factors that are beyond the Company's control and which cannot be predicted, such as market fluctuations, mineral markets and processing equipment, and changes to government regulations, including those relating to royalties, allowable production, importing and exporting of minerals, and environmental protection. This industry is intensely competitive and there is no guarantee that, even if commercial quantities are discovered, a profitable market will exist for their sale. The Company competes with other junior exploration companies for the acquisition of mineral claims as well for the engagement of qualified contractors. Metal prices have fluctuated widely in recent years, and they are determined in international markets over which the Company has no influence.

Governmental Regulation

Regulatory standards continue to change, making the review process longer, more complex and therefore more expensive. Exploration and development on the Company's properties are affected by government regulations relating to such matters as environmental protection, health, safety and labour, mining law reform, restrictions on production, price control, tax increases, maintenance of claims, and tenure. There is no assurance that future changes in such regulations couldn't result in additional expenses and capital expenditures, decreasing availability of capital, increased competition, reserve uncertainty, title risks, and delays in operations. The Company relies on the expertise and commitment of its management team, advisors, employees and contractors to ensure compliance with current laws.

Approval

The Board of Directors of Comstock Metals Ltd. has approved the contents of this Management Discussion and Analysis as of the date of this report.

Additional Information

Additional information concerning the Company and its operations is available on SEDAR at www.sedar.com and on the Company website at www.comstock-metals.com

Cautionary Note Regarding Forward Looking Statements

This MD&A includes some statements that may be considered "forward-looking statements". All statements in this discussion that address the Company's expectations about future exploration and development are forward-looking statements. Although the Company believes the expectations presented in such forward-looking statements are based on reasonable assumptions, such statements are not guarantees of future performance and actual results or developments may differ materially from those in the forward-looking statements. Factors that could cause actual results to differ materially from those in forward-looking statements include market prices, exploration successes, availability of capital and financing, and general economic, market, and business conditions. Readers are cautioned that any such statements are not guarantees of future performance and actual results or developments may differ materially from those projected in the forward-looking statements.