



UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
WASHINGTON, D.C. 20549

DIVISION OF  
CORPORATION FINANCE

Mail Stop 4628

May 11, 2016

Via E-Mail

Robert G. Watson Jr.  
Chief Executive Officer  
Enerjex Resources, Inc.  
4040 Broadway, Suite 508  
San Antonio, TX 78209

**Re: Enerjex Resources, Inc.**  
**Form 10-K for the Fiscal Year ended December 31, 2014**  
**Filed March 31, 2015**  
**Form 10-K for the Fiscal Year ended December 31, 2015**  
**Filed April 11, 2016**  
**File No. 1-36492**

Dear Mr. Watson:

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

Please respond to these comments within ten business days by providing the requested information or advise us as soon as possible when you will respond. If you do not believe our comments apply to your facts and circumstances, please tell us why in your response.

After reviewing any amendment to your filing and the information you provide in response to these comments, we may have additional comments. Unless we note otherwise, our references to prior comments are to comments in our March 4, 2016 letter.

Form 10-K for the Fiscal Year ended December 31, 2014

Notes to Consolidated Financial Statements

Supplemental Oil and Gas Reserve Information (Unaudited), page F-18

Estimated Quantities of Proved Reserves, page F-19

1. We have read your response to prior comment one and see that although your proposed disclosure revisions address the requirements regarding the separate disclosure by product type of changes in your proved developed and undeveloped reserves combined,

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for the periods ending December 31, 2014 and 2013, these do not specify the beginning and end-of-year quantities for each product type of proved *developed* reserves apart from proved *undeveloped* reserves, which is also required. Please further revise your disclosure to provide these details. You may refer to FASB ASC 932-235-55-2 for illustrations of the presentation requirement of FASB ASC 932-235-50-4. To the extent applicable, please incorporate these revisions in the Form 10-K for the fiscal year ending December 31, 2015 as well.

Form 10-K for the Fiscal Year ended December 31, 2015

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Estimated Quantities of Proved Reserves, page F-18

2. We note disclosure indicating you have not converted material quantities of proved undeveloped reserves to developed reserves for the years ending December 31, 2015 and 2014. Please provide us with your development schedule, indicating for each future period, the net quantities of proved reserves and estimated capital expenditures necessary to convert all of the proved undeveloped reserves disclosed as of December 31, 2015 to developed. Please refer to Rule 4-10(a)(31)(ii) of Regulation S-X and Question 131.04 in the Compliance and Disclosure Interpretations (C&DIs), issued October 26, 2009 and updated May 16, 2013, and either confirm or tell us the extent to which all of the proved undeveloped locations are part of a development plan that has been adopted by your management, including approval by your Board of Directors, if such approval is required, and is current as of December 31, 2015.

You may contact John Hodgins, Petroleum Engineer, at (202) 551-3699 if you have questions regarding the comments. Please contact Karl Hiller, Branch Chief, at (202) 551-3686 with any other questions.

Sincerely,

/s/H. Roger Schwall

H. Roger Schwall  
Assistant Director  
Office of Natural Resources