



One Ridgmar Centre
6500 West Freeway, Suite 800
Fort Worth, Texas 76116
Phone: 817.989.9000
Fax: 817.989.9001
www.approachresources.com

VIA E-MAIL

June 2, 2016

Mr. Brent J. Fields
Secretary
U.S. Securities and Exchange Commission
100F Street, N.E.
Washington D.C. 20549-1090
Rule-comments@sec.gov

Re: File 4-691: *Request to require disclosure of short positions in parity with required disclosure of long positions*

Dear Mr. Fields,

Approach Resources Inc. (NASDAQ: AREX), an independent energy company focused on the exploration and production of oil, natural gas liquids and natural gas, appreciates the opportunity to provide comment to the U.S. Securities and Exchange Commission (the "SEC") on File No. 4-691, the December 7, 2015, petition for rulemaking submitted by Nasdaq, Inc. Nasdaq's petition requests that the SEC "take swift action to promulgate rules to require public disclosure by investors of short positions in parity with the disclosure regime applicable to long positions..." Approach Resources strongly supports the short disclosure framework proposed by Nasdaq and we similarly urge the SEC to take this opportunity to implement meaningful public disclosure standards for short-sale activity at least to the same extent of long-position reporting.

Approach Resources and other U.S. shale producers create thousands of jobs for American citizens, boosting the U.S. economy. The capital needed to drill for and produce oil and natural gas (drilling one shale well can cost up to \$10 million) requires many growing companies to turn to the public markets for financing. Fair, liquid and efficient capital markets are vital to the industry's success. The current lack of transparency around short positions is enabling trading behavior that unfairly harms companies and their investors. A healthy market allows for either a long or short investor to invest in the future success or failure of a company. If both long and short investors are required to disclose positions in parity with one another, all market participants have the full range of information necessary to make informed trading decisions.

Approach Resources applauds Nasdaq for proposing this important reform to the short disclosure regime and urges the SEC to take action consistent with Nasdaq's petition to fulfill the SEC's mission of maintaining fair, orderly and efficient markets.

Respectfully,

A handwritten signature in blue ink that reads "Suzanne Ogle".

Suzanne Ogle
Vice President – Investor Relations & Corp. Communications