

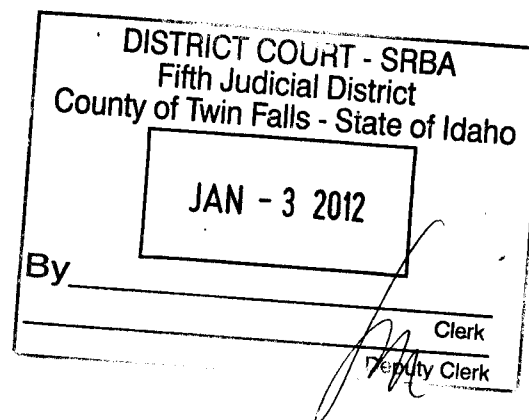
EXHIBIT 3 - PAGE 1

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Attorney for Big Wood Canal Company

IN THE DISTRICT COURT OF THE FIFTH JUDICIAL DISTRICT OF THE
 STATE OF IDAHO, IN AND FOR THE COUNTY OF TWIN FALLS

In Re SRBA

Subcase No. 37-21112

Case No. 39576.

**OBJECTOR'S JOINT RESPONSE TO
 CLAIMANT'S FIRST DISCOVERY
 REQUESTS**

COMES NOW BIG WOOD CANAL COMPANY and O'GARA et al. and responds to
 Claimant's First Discovery Requests to Objectors:

GENERAL OBJECTIONS

1. Respondents object to the Interrogatories and to the definitions and instructions to the extent they purport to require discovery responses beyond that required under the local rules and order of the Idaho Rules of Civil Procedure. These responses are provided in accordance with the Idaho Rules of Civil Procedure irrespective of any definitions and instructions that may accompany the discovery requests.

2. These responses are made subject to all objections as to competence, relevance, materiality, and admissibility. These responses are subject to all objections that would require the exclusion of any statement, material, or information herein provided if such requests were asked of, or any statement, material, or information provided were made by witness present and testifying in

OBJECTORS' JOINT RESPONSE TO FIRST DISCOVERY REQUESTS

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RESPONSE FOR ADMISSION NO. 9: Object as to relevance. However without waiving such objection it appears Exhibit 6 is a copy of the Objection.

REQUEST FOR ADMISSION NO. 10: Admit that attached hereto as Exhibit 7 is a true and correct copy of the Standard Form 5 - Stipulated Elements of a Water Right which your attorney signed and filed in Subcase 37-21114.

RESPONSE FOR ADMISSION NO. 10: Object as to relevance. Furthermore, object as to attorney/client privilege and work product. However without waiving such objection it appears Exhibit 7 is a copy of an SF-5.

REQUEST FOR ADMISSION NO. 11: Admit that attached hereto as Exhibit 8 is a true and correct copy of the Order of Partial Decree issued in the SRBA for Water Right 37-21114.

RESPONSE FOR ADMISSION NO. 11: Object as to relevance. However without waiving such objection it appears Exhibit 8 is a copy of a partial decree.

REQUEST FOR ADMISSION NO. 12: Admit that the irrigation diversion rate set forth in both the SF5 and Partial Decree for 37-21114 is 0.025 cfs per acre. 37-21114.

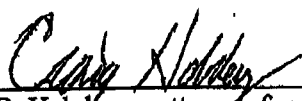
RESPONSE FOR ADMISSION NO. 12: See Response to Admission No. 7.

REQUEST FOR ADMISSION NO. 13: Admit that the Water Right and Water Right 37-21114 are splits of the same parent water right which was 37-12818A.

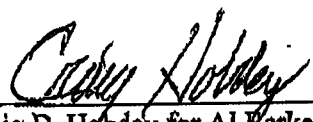
RESPONSE FOR ADMISSION NO. 13: Object as to relevance. However without waiving objections, Objectors are not experts in the splits and parents of water rights and are therefore without specific expert knowledge and unable to answer.

DATED THIS 30 day of December, 2011.

BIG WOOD CANAL COMPANY



Craig D. Hobdey as attorney for
Big Wood Canal Company



Craig D. Hobdey for Al Barker as Attorney
For O'Gara et al

EXHIBIT 3 - PAGE 3**CERTIFICATE OF SERVICE**

I **HEREBY CERTIFY** that on the 30 day of December, 2011, I served a true and correct copy of the foregoing **RESPONSE TO FIRST SET OF DISCOVERY REQUESTS** by the method indicated below and addressed to the following:

James P. Speck
Speck & Aanestad
PO Box 987
Ketchum ID 83340

U.S. Mail

Chief, Natural Resources Division
Office of the Attorney General, State of Idaho
PO Box 44449
Boise ID 83711-4449

U.S. Mail

The United States Department of Justice
Environmental and Natural Resources Division
550 West Fort Street
PO Box 33
Boise ID 83724

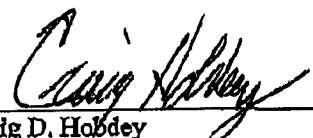
U.S. Mail

Idaho Department of Water Resources
Document Depository
PO Box 83720
Boise ID 83720-0098

U.S. Mail

Albert Barker
BARKER, ROSHOLT & SIMPSON
PO Box 2139
Boise ID 83701

U.S. Mail



Craig D. Hobdey