

The Oxford/Ray Road Mine Tour by Levy

October 4, 2025

Mine Name:	Ray Road
ASI #:	63-0115SG
County:	Oakland
Region:	Metro
Producer:	E.C. Levy – Nat Agg Div.
Address:	275 Ray Road, Oxford, MI 48371

(This information can be found on the Michigan Department of Transportation: Aggregate Source Inventory list, 09/12/2023)

DISCLAIMER: *The following report is provided by Oko Environmental, LLC for informational and educational purposes only. It reflects direct observations, publicly available information, and professional interpretation at the time of the site visit. The content should not be construed as legal, regulatory, or engineering advice. While care has been taken to ensure accuracy, conditions and interpretations may change as additional data become available. Readers are encouraged to verify information through appropriate regulatory agencies and qualified experts before drawing conclusions or making decisions based on this report.*

Oxford, Michigan is known as the Gravel Capitol of the World. There are several mining operations within Oxford, past and present, and so to avoid confusion, for the duration of this report, the mine will be referred to by its official name as found in MDOT records, **Ray Road**.

There were 10 participants of the Ray Road mine tour including Kara Okonewski of Oko Environmental, STEP, and several private Springfield Township residents. There were two Levy representatives, including Reuben Maxbauer, Real Estate & Government Relations for Levy, and another gentleman who mainly confirmed any technical details and assisted with logistics.

Our tour began promptly at 10 am within the office trailer on site. We reviewed safety precautions, signed waivers, and geared up with high-visibility vests, hardhats, eye protection, and gloves. Reuben gave a site overview of the mine, along with what we can expect to see along the tour. While the Ray Road site is approximately 1100 acres, 850-900 acres are available for mining. This is more than 3x the size of the proposed Ormond site. The Ray Road mine was started back in the 1990's (exact year was not known at the time of the tour). Levy estimates another 10-15 years of operation left at the Ray Road mine. Throughout the



tour, questions were flowing, many with how this mine relates to the Ormond Road proposal. There are some similarities, however there are many differences between the Ray Road operation and the proposed operation for Ormond Road.

SUMMARY

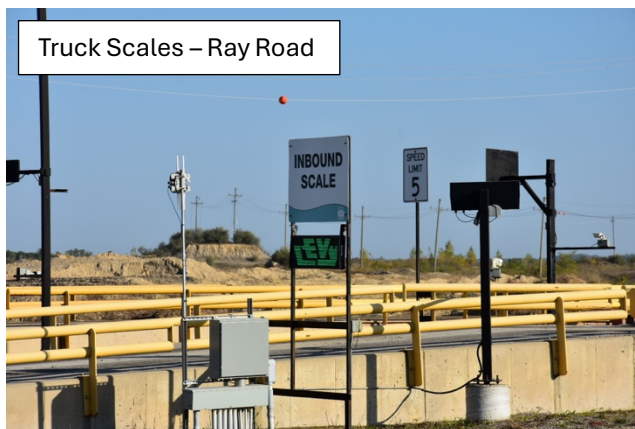
The October 4, 2025 tour of the Ray Road (Oxford) mining operation, hosted by The Levy Group, provided valuable insight into general aggregate mining practices and allowed participants to observe key components of an active dry and wet mining site. The visit was helpful in understanding the scale and complexity of large aggregate operations, as well as in identifying additional technical and environmental questions related to the proposed Ormond Road mine.

However, the Ray Road site differs substantially from the proposed Ormond Road project in nearly every respect—including size, location, surrounding land use, operational design, and regulatory requirements. The Ray Road mine covers roughly three times the acreage of the Ormond site, operates within an established extraction district, and does not employ the same proposed processing methods, water management systems, or reclamation approach.

As a result, while the tour offered useful context and an opportunity to engage directly with Levy representatives, it was not a reliable or representative comparison for evaluating the potential impacts or operational expectations of the Ormond Road proposal. Instead, it underscored the need for more detailed site-specific data, clearer explanations from Levy, and independent verification of the processes proposed for Springfield Township.

GRAVEL TRAINS

The first questions were about gravel trains, weights, and roadways. An empty gravel train (which consists of a semi-tractor pulling two specialized dump trailers) is weighed at least twice. Entering gravel trains are weighed before receiving any material. The average weight of an empty gravel train is approximately 80,000 lbs. Once the train has been loaded with material, it is weighed again when exiting the plant. If the gross weight of the gravel train exceeds the maximum of 164,000



lbs., the train must offload material until it weighs 164,000 lbs or less before leaving the facility. The maximum gross vehicle weight allowed in Michigan is 164,000 lbs. (based upon # of axles) for Class A roads. The plant entrance and exit is located on Ray Road, which is a Class B rated road. Because Levy exceeds the roads weight restrictions for a Class B road, Levy has special bonds put in place to repair the road for any damage caused by the gravel

trains. The truck scales are inspected yearly by a third party. They are also subject to unannounced inspections, ensuring the scales are properly calibrated. When asked about the number of residential driveways and school bus stops are located along the gravel train route, Levy did not know but will research and reach back with answers.

THE RAY ROAD MINING OPERATION

The mining operation at Ray Road was selected by Levy for the Springfield tour because this particular mine has a large diversity of mining equipment and operations. However, the proposed Ormond Road mining process and washing equipment is not what would be used if the permit becomes approved. The Ray Road operation did not accurately demonstrate the entire process of what has been proposed at Ormond Road. While Oko Environmental is still confirming exactly what portions of the tour are applicable to the Ormond Road site, the conveyor belt system, truck scales, office trailer, and dry mining area would be part of the Ormond Road site.



DRY-MINING

Dry mining is the process of excavating and extracting sand and gravel from the land, resulting in a large open pit. As the earth is removed, it is transported to processing areas for washing, sorting, and crushing. Site preparation begins with the removal of overburden—the upper layers of soil and material that do not contain marketable resources. This overburden is often stockpiled or



compacted to create berms that help shield mining operations from public view. Levy was unsure of the height of the berms at the Ray Road operation and will reach out with answers. During the tour of the Ray Road Mine, we witnessed a section of the pit wall suddenly give way, sending loose material sliding down the slope. The collapse happened because the sand and gravel layers are loose and unstable once the supporting earth is removed. Without moisture or structure to hold them together, these layers easily crumble and fall. Levy confirmed on the tour that dry

mining would be one type of mining that would be taking place at the proposed Ormond Road site, pushing overburden to create berms and washing marketable material in a large ‘tank’, which was not on site at the Ray Road mine and so we were unable to view what that looks like or how it works.

RECLAMATION

The Ray Road mine has no concurrent reclamation as it is not required by the local ordinances. The Ray Road operation is located in Oxford’s ‘Extraction District’. The Ormond Road proposal would be required to have ongoing reclamation as the mining operation moves in phases. There was no demonstration of that on the Ray Road site, so we were unable to observe what that looks like in practice.

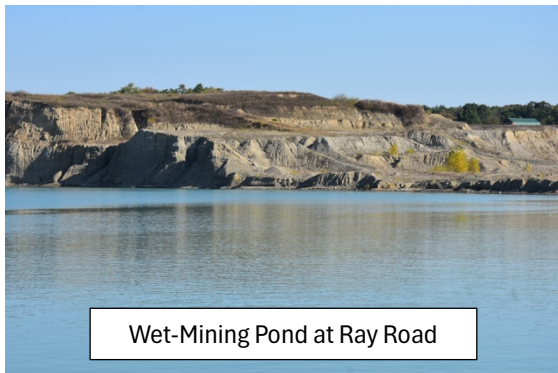
WET-MINING

The Ray Road wet-mining operation shown during the tour does not demonstrate what is proposed at Ormond Road. The wet-mining process that is proposed at Ormond would be dragline dredging. Dragline dredging involves a large bucket being dragged along the bottom of a water-filled area, and then dumped for cleaning, sorting, and crushing. Pictured below are two buckets on site at the Ray Road



Dry Mining Area at Ray Road (b)

that would be the extraction method for wet-mining for the proposed Ormond Road site.

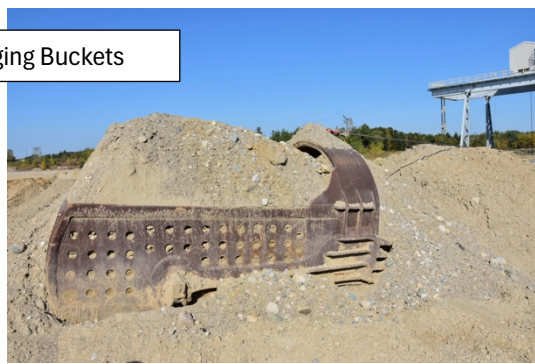


Wet-Mining Pond at Ray Road

The Ray Road operation does not pump up any water from the aquifer, instead the excavation extends below the water table, creating a man-made pond. Levy stated that the water quality is checked at the Ray Road operation but did not say specifically what was measured or how often it is measured.



Dragline Dredging Buckets





OPERATING HOURS & MARKET AVAILABILITY

Levy monitors material quality control regularly and the Ray Road mine produces approximately 1 million tons of material per year. Currently, the Ray Road operation does not operate on weekends. When questioned about this, Reuben said the ‘demand is not there’ to warrant weekend operations. They specifically opened the mine with a few operators for our tour on a Saturday but sent them all home as soon as the tour was complete. Reuben did say that they will open the mine if there is an urgent need, such as a sink hole. The most recent Ormond Road proposal includes Monday through Saturday operating hours.

Reuben stated that Levy is facing potential shortages, but not from a lack of material in the state, but lack of permittable sites. Reuben confirmed that there is no shortage of material in Michigan, it is the imposed restrictions and permits that aggregate industries face that causes reduction in marketable material.

ADDITIONAL QUESTIONS & INFORMATION

This report summarizes observations and information available as of the date of the site visit. It should not be considered all-inclusive. Additional details are still being reviewed and fact-checked, and Oko Environmental, LLC is awaiting responses from The Levy Group to several key questions raised during the tour. Updated information will be incorporated as it becomes available to ensure the most accurate and complete understanding of site conditions and proposed operations. This report represents independent observations during a guided tour of the Ray Road mining operation on October 4, 2025. Certain descriptions and statements reflect information provided verbally by company representatives and have not yet been independently verified.