

ODIS LLC — Level 1 Compliance & Methodology Statement

Topside Level 1 Surveys | Gulf of America

Aligned with API RP 2A (21st Edition), Section 14 | Consistent with BSEE expectations

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1. Purpose

This document outlines ODIS LLC's methodology for performing **Level 1 Topside Surveys** and clarifies ODIS's use of drones as a **supporting documentation tool** while maintaining inspection practices consistent with **BSEE expectations** and aligned with **API RP 2A (21st Edition), Section 14** requirements.

This document is maintained as a controlled document within ODIS's Quality Management System (QMS) and supports continual improvement and consistency of deliverables.

2. BSEE Position on Drone Use (Clarification)

ODIS adheres to BSEE's position regarding drone use for Level 1 surveys:

“For Level 1 surveys the use of drones will not be accepted as the sole method for the completion of the surveys.”

BSEE notes that drones may be helpful for capturing images/video, but drones do not provide access for internal areas and do not replace required inspection actions such as CP readings, close visual inspection, coatings evaluation, and other required tasks.

3. ODIS Level 1 Survey Methodology (Standard Practice)

ODIS performs Level 1 surveys using a compliance-first approach built around physical access and repeatable execution. **ODIS does not perform drone-only Level 1 surveys.**

3.1 Physical Boarding & Systematic Walkdown

- ODIS personnel **physically board the structure** (when safely accessible)
- A systematic topside walkdown is completed using a structured approach aligned with **API RP 2A (21st Ed.) Section 14** expectations

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- Findings are documented in a traceable format suitable for integrity programs and regulatory review

3.2 Close Visual Inspection & Condition Documentation

- Close visual inspection is conducted on structural components and areas of interest
- Observations are recorded with clear photographic documentation and written condition notes
- Areas requiring follow-up or engineering evaluation are identified and documented

3.3 CP Readings & Measurements (As Required by Scope)

- CP readings and other required measurements are collected as scope requires
- Documentation is recorded in a consistent, traceable manner for reporting

3.4 Drone Use (Supporting Tool Only)

ODIS uses drones selectively as a **supporting tool** to improve documentation quality (typically **10–15%** of topside media capture), including:

- compass-point overview imagery
- high-angle imagery
- restricted geometry images that improve documentation context and clarity

Drone use is not accepted and is not utilized by ODIS as the sole method for completion of Level 1 surveys.

3.5 Non-Boardable Structures / Contingency Approach

If a structure cannot be boarded due to operational or safety constraints, ODIS documents the constraints and applies an alternate approach appropriate to scope and client objectives, including the use of ROV-based observation when appropriate and when permitted by scope and safety constraints.

4. Reporting & Deliverables

All deliverables and supporting records are retained and managed under ODIS document control procedures to support traceability, revision control, and client/regulatory needs.

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4.1 Quality Management & Continuous Improvement (ISO 9001 Alignment)

ODIS is implementing ISO 9001-aligned quality management practices to improve consistency, document control, corrective actions, and continual improvement across all inspection deliverables. This methodology statement is maintained under document control and reviewed periodically for effectiveness and alignment with client and regulatory expectations.

5. Summary Statement

ODIS performs Level 1 surveys consistent with BSEE expectations and aligned with API RP 2A (21st Edition), Section 14 requirements. ODIS physically boards structures to complete required inspection activities and uses drones selectively as a supporting documentation tool — **not as the sole method** for Level 1 survey completion.

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